

# **Exhibit 7**

UNITED STATES SOUTHERN DISTRICT  
SOUTHERN DISTRICT OF NEW YORK

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GRAHAM CHASE ROBINSON,

Plaintiff,

-against-

Case No:  
1:19-cv-09156 (LTS) (KHP)

ROBERT DE NIRO and CANAL PRODUCTIONS, INC.,

Defendants.

-----x  
DEPOSITION TAKEN VIA ZOOM

March 30, 2022  
9:32 a.m.

VIDEOTAPED DEPOSITION of TIFFANY CHEN, held at  
the above-mentioned time, before, PAIGE HAYDEN, a Court  
Reporter and Notary Public of the State of New York.  
-----X

MAGNA LEGAL SERVICES  
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1 A P P E A R A N C E S:

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4  
5 BY: EARL WARD, ESQ.

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9 BY: KATE MACMULLIN, ESQ.

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19  
20 ALSO PRESENT:

21 CHRIS DINYA, VIDEOGRAPHER, MAGNA LEGAL SERVICES

22 ALEXANDRA HARWIN, SANFORD HEISLER SHARP, LLP  
ANNIE SLOAN, SANFORD HEISLER SHARP, LLP  
JEREMY HEISLER, SANFORD HEISLER SHARP, LLP  
23 JEREMY MARGOLIS, SANFORD HEISLER SHARP, LLP

24 CHASE GRAHAM ROBINSON, PLAINTIFF  
BRITTANY K. LAZZARO, TARTER KRINSKY & DROGIN LLP  
25 TOM HARVEY

FEDERAL STIPULATIONS

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IT IS HEREBY STIPULATED AND AGREED by and between the attorneys for the respective parties herein, that filing and sealing be and the same are hereby waived.

IT IS FURTHER STIPULATED AND AGREED that all objections, except as to form of the question, shall be reserved to the time of the trial.

IT IS FURTHER STIPULATED AND AGREED that the within deposition may be sworn to and signed before any officer authorized to administer an oath, with the same force and effect as if signed and sworn to before this Court.

1

2           THE VIDEOGRAPHER: We are  
3 now on the record. This  
4 begins video number one in  
5 the deposition of Tiffany  
6 Chen, in the matter of Graham  
7 Chase Robinson V Robert De  
8 Niro and Canal Productions,  
9 Inc.

10           Today is Wednesday March  
11 30, 2020, and the time is  
12 9:32 a.m.

13           Counsel and all parties  
14 present will be noted on the  
15 stenographic record.

16           Will the court reporter  
17 please swear in the witness?

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1

2       TIFFANY CHEN, the WITNESS  
3       herein, having been first  
4       duly sworn by a Notary Public  
5       of the State of New York, was  
6       examined and testified as  
7       follows:

8       EXAMINATION BY

9       MS. MACMULLIN:

10      Q.       State your name for the  
11      record, please.

12      A.       Tiffany Chen.

13      Q.       State your address for the  
14      record, please.

15      A.       375 Greenwich Street, New  
16      York, New York 10013.

17      Q.       Alright. Good morning. My  
18      name is Kate MacMullin. I am an  
19      attorney from Sanford Heisler Sharp,  
20      and I represent Plaintiff, Graham  
21      Chase Robinson, in this lawsuit.  
22      Thank you for being here today for  
23      your deposition.

24               Before we begin, I am going  
25      to explain to you some of the ground

1 T. CHEN

2 rules for your deposition.

3 MS. LAZZARO: Before we  
4 start, can we agree to the  
5 regular stipulations?

6 MS. MACMULLIN: We  
7 stipulate that all objections  
8 except as to the form of the  
9 question are reserved until  
10 the time of the trial.

11 MR. WARD: Agreed.

12 Q. Alright. So Ms. Chen, I  
13 will ask you questions today and  
14 both my questions and your answers  
15 will be recorded by the court  
16 reporter. Both of us need to speak  
17 up, and speak clearly and slowly so  
18 that the court reporter can record  
19 everything.

20 Do you understand that?

21 A. I do.

22 Q. Also, you must answer  
23 verbally because the court reporter  
24 cannot record a nod or shake of the  
25 head.

1 T. CHEN

2 Do you understand that?

3 A. I do.

4 Q. Please wait until I finish  
5 my question before you start  
6 answering.

7 If you don't --

8 A. Okay.

9 Q. Thank you.

10 If you don't understand my  
11 question for any reason, don't  
12 answer it, and please ask for  
13 clarification. If you answer the  
14 question, however, we will assume  
15 that you understood the question.

16 Do you understand that?

17 A. I do.

18 Q. Also, if you need a break  
19 at any time or for any reason, let  
20 me know, and we will finish your  
21 answer if we are in the middle of it  
22 and then take a break. The only  
23 time you can't take a break is if  
24 there is a question is pending.

25 Do you understand that?

1 T. CHEN

2 A. I do.

3 Q. Your attorney may object  
4 from time to time. Unless he  
5 instructs you not to answer, you  
6 should still answer my question.

7 Do you understand that?

8 A. I do.

9 Q. If you answer a question  
10 and later on you remember some  
11 additional information, or you would  
12 like to clarify your earlier  
13 response, please tell me that you  
14 would like to add something to an  
15 earlier answer, and I will give you  
16 the opportunity to do that.

17 Do you understand that?

18 A. I do.

19 Q. If I use a term or  
20 abbreviation incorrectly, please  
21 correct my usage so that we can make  
22 sure we all have the same  
23 understanding of what the record  
24 means.

25 A. Okay.

1 T. CHEN

2 Q. When I refer to Canal, I am  
3 referring to Canal Productions, Inc.  
4 If you are unsure by what I mean by  
5 any term, please let me know.

6 A. Okay.

7 Q. Is there any instruction  
8 that I have provided that you do not  
9 understand or do not agree with?

10 A. No.

11 Q. This testimony is under  
12 oath, just as if you were in a court  
13 of law. This testimony may be used  
14 as evidence in this case.

15 Do you understand that?

16 A. Yes.

17 Q. Do you have any electronic  
18 screens or communication devices  
19 with you in the room that you are in  
20 right now, other than the computer  
21 that is capturing you?

22 A. No, I don't.

23 Q. Okay.

24 And is there anyone else in  
25 the room with you today other than

1 T. CHEN

2 your counsel?

3 A. No.

4 Q. Do you understand your  
5 obligation to provide testimony that  
6 is truthful and complete?

7 A. Yes.

8 Q. Do you understand that you  
9 are required to tell the truth here  
10 today, even if it might be hurtful  
11 to Mr. De Niro?

12 A. Yes.

13 Q. Do you understand that you  
14 are required to tell the truth even  
15 if it might be hurtful to you?

16 A. Uh-huh. Yes.

17 Q. What is your full name?

18 A. Tiffany Chen.

19 Q. And I'm sorry, it is just a  
20 little bit difficult to see you, Ms.  
21 Chen. I am wondering if the camera  
22 can be adjusted so that we can see  
23 you a little bit more clearly.

24 A. Okay.

25 (Whereupon, a discussion

1 T. CHEN

2 was held off the record.)

3 Q. Have you gone by any other  
4 name other than Tiffany Chen?

5 A. No.

6 Q. What is your date of birth?

7 A. 4/22/78. April 22, 1978.

8 Q. And just to return, do you  
9 have a middle name, Ms. Chen?

10 A. Yes.

11 Q. And what is that?

12 A. It is Chinese. In English,  
13 phonetically, it sounds like funny.

14 Q. Okay.

15 And could you spell it?

16 A. Phonetically, it is spelled  
17 F-E-I - N-I.

18 Q. What is your home address?

19 A. 117A East 65th Street.

20 Q. How long have you resided  
21 at that address?

22 A. About five years now.

23 Q. Does anyone else reside  
24 with you at that address?

25 A. Yes.

1 T. CHEN

2 Q. Who?

3 A. My boyfriend.

4 Q. And who is your boyfriend?

5 A. Robert De Niro.

6 Q. Are you married?

7 A. No.

8 Q. Do you have any children?

9 A. Not my own. I have  
10 stepchildren.

11 Q. Have you ever been married?

12 A. No.

13 Q. Do you suffer from any  
14 condition that affects your memory?

15 A. No.

16 Q. Have you consumed any  
17 substances that affect your memory  
18 or ability to communicate today?

19 A. Nope.

20 Q. Is there any reason,  
21 physically or mentally, that you are  
22 not able to testify today truthfully  
23 and completely?

24 A. No.

25 Q. Other than this case, have

1 T. CHEN

2 you ever been involved in any other  
3 lawsuit or other judicial, arbitral  
4 or administrative proceeding?

5 A. Nope.

6 Q. Have you ever been a  
7 witness for another lawsuit or other  
8 judicial, arbitral, or  
9 administrative proceeding?

10 A. No.

11 Q. Have you ever testified  
12 under oath before?

13 A. Nope.

14 Q. Have you ever provided a  
15 sworn statement, declaration, or  
16 affidavit relating to any lawsuit or  
17 other judicial, arbitral, or  
18 administrative proceeding?

19 A. No.

20 Q. Have you ever provided any  
21 testimony or any sworn statement in  
22 a case involving Canal Productions  
23 or Mr. De Niro?

24 A. No.

25 Q. Have you provided any sworn

1 T. CHEN

2 statements, declaration, or  
3 affidavit relating to the lawsuit  
4 brought by Chase Robinson?

5 A. No.

6 Q. Have you provided any sworn  
7 statement, declaration, or affidavit  
8 relating to the lawsuit or  
9 counterclaims brought by Canal  
10 Productions against Ms. Robinson?

11 A. No.

12 Q. Have you ever been  
13 convicted of a criminal offence?

14 A. No.

15 Q. Have you ever been charged  
16 or arrested in connection with a  
17 criminal offence?

18 A. Nope.

19 Q. Have you ever been accused  
20 of making any false statement?

21 A. No.

22 Q. You are represented by Earl  
23 Ward from Emery Celli in this  
24 deposition, is that correct?

25 A. Yes.

1 T. CHEN

2 Q. When did you first come to  
3 be represented by Emery Celli?

4 A. It is about -- I would say  
5 maybe five to six weeks ago.

6 Q. Have you been represented  
7 by any other attorney in connection  
8 with the lawsuit brought by Ms.  
9 Robinson against Mr. De Niro and  
10 Canal or in Canal's lawsuit or  
11 counterclaims against Ms. Robinson?

12 A. No.

13 Q. Have you ever been  
14 represented by Traub Lieberman?

15 A. No.

16 Q. Have you ever been  
17 represented by Tarter Krinsky &  
18 Drogin?

19 A. No.

20 Q. Has Tom Harvey ever  
21 represented you as a lawyer?

22 A. No. I said no.

23 Q. Yes. Just taking a pause.

24 A. Okay.

25 Q. Ms. Chen, what have you

1 T. CHEN

2 done to prepare for today's  
3 deposition?

4 A. Talked to my lawyer.

5 Q. And when did you speak with  
6 your lawyer?

7 A. I spoke to him today.

8 Q. And how long did your  
9 conversation last?

10 A. It was fragmented. I would  
11 say the total amount of time was --  
12 we spoke like 12 minutes.

13 Q. And other than today, did  
14 you speak with your lawyer on  
15 another occasion to prepare for  
16 today's deposition?

17 A. Yesterday.

18 Q. And how long was that  
19 conversation?

20 A. About a little under an  
21 hour.

22 Q. And were there any  
23 non-attorneys present either today  
24 or yesterday?

25 A. No.

1 T. CHEN

2 Q. And other than today or  
3 yesterday, did you meet with your  
4 attorney to prepare for today's  
5 deposition?

6 A. Could you repeat that  
7 again?

8 Q. Yes.

9 Other than today or  
10 yesterday, did you meet with your  
11 attorney to prepare for today's  
12 deposition?

13 A. Yes, on Saturday.

14 Q. And how long did you meet  
15 with your attorney on Saturday?

16 A. About -- it would have been  
17 -- probably just around an hour, the  
18 same as yesterday.

19 Q. And other than today,  
20 yesterday, and Saturday, did you  
21 meet with your attorney on any other  
22 occasions to prepare for today's  
23 deposition?

24 A. No.

25 Q. Have you spoken -- sorry.

1 T. CHEN

2 A. No.

3 Q. Okay.

4 Have you spoken with anyone  
5 else regarding your deposition?

6 A. Yes.

7 Q. Who?

8 A. My boyfriend.

9 Q. And what did you say about  
10 the deposition?

11 A. That I had to be deposed  
12 today, so we had to figure out the  
13 children's schedule with some of our  
14 staff because I would be deposed.

15 Q. And what, if anything, did  
16 Mr. De Niro say about your  
17 deposition today?

18 A. He said, "Okay. We will  
19 figure it out."

20 Q. Have you spoken with anyone  
21 else regarding your deposition?

22 A. No. Nope.

23 Q. Did you speak to anyone  
24 else about their depositions in this  
25 case?

1 T. CHEN

2 A. No.

3 Q. Have you reviewed any  
4 documents in preparation for your  
5 deposition?

6 A. No.

7 Q. Have you reviewed the  
8 Complaint in this case?

9 A. Nope.

10 Q. Have you reviewed the  
11 Answer and Counterclaims in this  
12 case?

13 A. Nope.

14 Q. Have you reviewed the  
15 lawsuit Canal filed against Ms.  
16 Robinson?

17 A. No.

18 Q. Did you bring any documents  
19 with you today relating to this  
20 case?

21 A. No.

22 Q. Ms. Chen, could you please  
23 describe for me your educational  
24 history?

25 A. I went to Brooklyn

1 T. CHEN

2 Technical High School for high  
3 school. I went to SUNY Potsdam for  
4 college, transferred back to the  
5 City and went to Baruch.

6 Q. And when did you graduate  
7 from college?

8 A. I didn't finish. I started  
9 fighting.

10 Q. Okay.

11 What do you mean when you  
12 say that you started fighting?

13 A. I am a retired full-contact  
14 fighter. So I was -- I had started  
15 my full-time -- full-contact  
16 fighting career towards the end of  
17 college. And I had done well enough  
18 to fight at a world championship so  
19 I went with that. It is not easy to  
20 get there, so it was an opportunity  
21 that was right for the moment.

22 Q. How did you come to know  
23 Robert De Niro?

24 A. I worked on a movie with  
25 him.

1 T. CHEN

2 Q. And what is the nature of  
3 your relationship with Robert De  
4 Niro today?

5           A.       I have told you he is my  
6   boyfriend.   It is still the same.

7

25 MR. WARD: Objection.

1 T. CHEN

2 You have already gotten  
3 information about the  
4 relationship. Now you are  
5 getting into details. This  
6 amounts to harassment at this  
7 point.

8 MS. MACMULLIN: I can  
9 rephrase the question.

10 Q. Did you begin an ongoing  
11 sexual relationship with Mr. De Niro  
12 in 2017?

13 A. I have told you several  
14 times that he is my boyfriend. I  
15 think that answers the question.

16 Q. When did you and Mr. De  
17 Niro begin residing together?

18 A. In 2018.

19 Q. And when you and Mr. De  
20 Niro began residing together, was he  
21 still married?

22 A. Yes.

23 Q. Was there a period of time  
24 when Mr. De Niro was concealing his  
25 romantic relationship with you from

1 T. CHEN

2 others?

3 MR. WARD: Objection.

4 You can answer if you know.

5 A. Can you repeat that?

6 Q. Was there a period when Mr.  
7 De Niro was concealing his romantic  
8 relationship with you from others?

9 A. Well, we don't talk about  
10 our romantic relationship with  
11 anybody. So I don't understand what  
12 you mean by romantic relationship  
13 because everybody does know that I  
14 am his girlfriend.

15 Q. Was there a period of time  
16 when Mr. De Niro was concealing his  
17 romantic relationship with you from  
18 others?

19 MR. WARD: Objection.

20 You can answer if you know.

21 A. Yes.

22 Q. And from whom was he  
23 concealing his romantic relationship  
24 with you?

25 A. From people at the office,

1 T. CHEN

2 and from his family.

3 Q. Over what period of time  
4 was Mr. De Niro concealing his  
5 romantic relationship with you from  
6 others?

7 A. Others is a very broad term  
8 because there is no absolute to how  
9 he handled it with everybody. It  
10 didn't happen at the same time.

11 Q. Sure.

12 Over what period of time  
13 was Mr. De Niro concealing his  
14 romantic relationship with you from  
15 people in the office and his family?

16 A. I -- that is very poorly  
17 phrased because how he handles the  
18 office and how he handles his family  
19 are two different things.

20 Q. So how -- over what period  
21 of time was Mr. De Niro concealing  
22 his romantic relationship with you  
23 from the office?

24 A. Until about -- I would say  
25 late -- late 2018, and then it

1 T. CHEN  
2 opened up in early 2019.

3 Q. And over what period of  
4 time was Mr. De Niro concealing his  
5 romantic relationship with you from  
6 his family?

7 MR. WARD: Objection.

8 Ms. MacMullin, is this about  
9 their relationship or is this  
10 about the claims in the  
11 lawsuit? I don't understand  
12 where we are going here in  
13 terms of relevance.

14 MS. MACMULLIN: It is  
15 background information.

16 MR. WARD: I mean, I  
17 think you have gotten enough  
18 background information. They  
19 are involved in a  
20 relationship. She has  
21 already mentioned that. I am  
22 just concerned about how far  
23 you intend to go along these  
24 lines with this line of  
25 questioning. She'll answer

1 T. CHEN

2 the next question, but I am  
3 telling you now we are not  
4 going to go too far into  
5 this. This is -- it is  
6 ridiculous and it's  
7 harassment. So let's move on  
8 and let's get to the core of  
9 this.

10 Q. Ms. Chen, please answer the  
11 question.

12 A. Could you ask it again?

13 Q. Sure.

14 Over what period of time  
15 was Mr. De Niro concealing his  
16 romantic relationship with you from  
17 his family?

18 A. They knew in 2017.

19 Q. Okay.

20 I am going to be  
21 introducing our first exhibit in the  
22 chat. I hope that will work for you  
23 to be able to see the document, Ms.  
24 Chen, if we share it over Zoom.

25 A. Okay.

1 T. CHEN

2 MS. MACMULLIN: This  
3 document is Bates stamped  
4 Canal\_0048735 to 37, and we  
5 will be marking this document  
6 as Plaintiff's Exhibit 68.

7 (Whereupon, Plaintiff's  
8 Exhibit 68, Canal\_0048735 to  
9 37, was marked for  
10 identification, as of this  
11 date.)

12 Q. Let me know when you are  
13 able to have that up.

14 A. I don't see anything.

15 Q. It should have just been  
16 shared in the chat. So it would  
17 have to be downloaded and opened.

18 A. How do we do that? There  
19 is a little thing there.

20 MR. WARD: It won't just  
21 pop up on the scene.

22 A. I don't want to touch  
23 anything and ruin --

24 MS. MACMULLIN: Can we go  
25 off the record?

1 T. CHEN

2 THE VIDEOGRAPHER: The  
3 time is now 9:54 a.m. We are  
4 off the record.

5 (Whereupon, a recess was  
6 taken at this time.)

7 THE VIDEOGRAPHER: The  
8 time is now 10:04 a.m. and we  
9 are back on the record.

10 MS. MACMULLIN: Thank  
11 you. Sorry. One last  
12 logistical thing, if everyone  
13 who would like to receive the  
14 exhibits by e-mail can just  
15 type their e-mail address in  
16 into the chat, we will e-mail  
17 them that way.

18 Q. Ms. Chen, now turning to  
19 the document that has been marked as  
20 Plaintiff's Exhibit 68, this is a  
21 series of text messages between you  
22 and Mr. De Niro.

23 A. So I look at this now?  
24 This thing?

25 Q. Yes. Okay.

1 T. CHEN

2 So if you could please turn  
3 to page three of the document.

4 A. Uh-huh.

5 Q. Do you see your message,  
6 which says, "I will get dropped off  
7 a couple of blocks away?"

8 A. Yeah.

9 Q. Why were you being dropped  
10 off several blocks away?

11 A. I don't remember.

12 Q. And does looking at the  
13 whole sentence, which says, "You  
14 have told me 3:45. So I am in a car  
15 now. I will check with Chase  
16 though, and if need be, I will get  
17 dropped off a couple of blocks way."

18 Does that refresh your  
19 recollection as to why you needed to  
20 be dropped off a couple of blocks  
21 away?

22 A. The only thing that I can  
23 put together from looking at this is  
24 that he had Helen. Looking at the  
25 time, 3:45, and I was dropping off

1 T. CHEN  
2 the dogs it seems for her. And  
3 there must have been something where  
4 the timing just got messed up and I  
5 hadn't met the children yet, so in  
6 the midst of the divorce and not  
7 having met the children, I think it  
8 was just to keep everything right  
9 for the kids.

10 Q. Was there a period of time  
11 when Ms. Robinson was coordinating  
12 meetings with you and Mr. De Niro?

13 A. No.

14 Q. Okay.

15 We are going to send the  
16 next document, which is Bates stamp  
17 Canal\_0048658 through 61. And we  
18 will mark this document as  
19 Plaintiff's Exhibit 69.

20 (Whereupon, Plaintiff's  
21 Exhibit 69, Canal\_0048658  
22 through 61, was marked for  
23 identification, as of this  
24 date.)

25 A. So we are done with this

1 T. CHEN

2 one?

3 MR. WARD: Yes. The  
4 others will be sent to me by  
5 e-mail?

6 MS. MACMULLIN: Yes.

7 MR. WARD: Thank you.

8 (Whereupon, a discussion  
9 was held off the record.)

10 MS. MACMULLIN: We can go  
11 off the record?

12 THE VIDEOGRAPHER: The  
13 time is now 10:09 a.m. We  
14 are off the record.

15 (Whereupon, a recess was  
16 taken at this time.)

17 THE VIDEOGRAPHER: The  
18 time is now 10:13 a.m. We  
19 are back on the record.

20 Q. So Ms. Chen, looking at  
21 what has been marked as Plaintiff's  
22 Exhibit 69, can you please turn to  
23 the fourth page of the document?

24 A. (Witness complies). I  
25 think I am here.

1 T. CHEN

2 Q. Okay.

3 Do you see your message, at  
4 8:38 p.m., which says, "We also need  
5 to discuss everything happening  
6 later in the week and where I can or  
7 cannot be?"

8 A. Yeah.

9 Q. What was that referring to?

10 A. It was referring to the  
11 work at the townhouse, and the fact  
12 that Chase had overly dramatized  
13 constantly me being at the house  
14 because she felt that we should keep  
15 everything a secret from the office.

16 Q. What did Ms. Robinson  
17 communicate to you in that regard?

18 A. What do you mean by that?

19 Q. What did Ms. Robinson  
20 communicate to you that led you to  
21 that conclusion that you just  
22 described about her wanting to keep  
23 things secret from the office?

24 A. She would say it to me.

25 Q. What would she say to you?

1 T. CHEN

2 A. Whenever I would try to get  
3 a straight answer from her, or  
4 understand scheduling, she would  
5 rattle off a bunch of things that  
6 never made sense. But the only  
7 thing that she was consistent about  
8 was saying that, "Well, you  
9 shouldn't really be around because  
10 there is going to be other people  
11 around." That is what she would say  
12 in different ways all the time, but  
13 never made sense. But her paranoia  
14 about just not wanting anybody to  
15 know about me was always delivered  
16 directly from her.

17 Q. Ms. Chen, have you ever  
18 been employed by Canal Productions,  
19 Inc.?

20 A. No.

21 Q. Have you ever received a  
22 salary from Canal?

23 A. No.

24 Q. Have you ever received any  
25 benefits from Canal?

1 T. CHEN

2 A. No.

3 Q. Have you ever held a job  
4 title at Canal?

5 A. No.

6 Q. Have you ever received  
7 health insurance from Canal?

8 A. Yes.

9 Q. When did you receive health  
10 insurance from Canal?

11 A. I think this January.

12 Q. This January of 2022?

13 A. Yes.

14 Q. Do you currently receive  
15 health insurance from Canal?

16 A. Yes.

17 Q. When did you begin to have  
18 regular communications with Canal  
19 employees?

20 A. 2019.

21 Q. And which Canal employees  
22 did you have regular communications  
23 with in 2019?

24 A. In 2019?

25 Q. Yes.

1 T. CHEN

2 A. Everyone.

3 Q. Could you list those Canal  
4 employees, please?

5 A. Michael Kaplan, Jillian  
6 Spear, and Sabrina Weeks-Britain.

7 Q. When did you first meet Ms.  
8 Robinson?

9 A. In the fall of 2018.

10 Q. What, if anything, had Mr.  
11 De Niro told you about Ms. Robinson  
12 prior to meeting her?

13 A. She -- that she had seemed  
14 to always get the job done, she was  
15 very weird, uncomfortable to talk  
16 to, and just strange. But as long  
17 as she did the work, that is all he  
18 wanted her to do.

19 Q. Did Mr. De Niro say  
20 anything to you about what role Ms.  
21 Robinson performed at Canal?

22 A. She was an assistant.

23 Q. What were your first  
24 impressions of Ms. Robinson?

25 A. There is something wrong

1 T. CHEN

2 with her, very seriously wrong with  
3 her.

4 Q. Why did you think there was  
5 something wrong with her?

6 A. When I met her face to face  
7 she couldn't look me in the face,  
8 kept looking down, grabbing her  
9 temple, and just going (indicating)  
10 the whole time. And I kept asking  
11 her, "Is everything okay? Is  
12 something wrong?" And she just  
13 would go (indicating). "I didn't  
14 have my coffee today." The whole  
15 time.

16 Q. During the period between  
17 when you first met Ms. Robinson and  
18 her resignation in April of 2019,  
19 how often did you interact with her?

20 A. Strange, not very much at  
21 all.

22 Q. How often would you speak  
23 with Ms. Robinson on the phone  
24 during a typical week?

25 A. A typical week, during

1 T. CHEN  
2 literally a three-month period where  
3 I knew her, not very much because  
4 you can never get a straight answer.  
5 So I always wanted to try to  
6 communicate in text to have a  
7 definitive writing document of what  
8 she said so that we can reference it  
9 all the time. Because if you talk  
10 to her, you get gibberish. Its  
11 gibberish all the time, followed  
12 with, "Oh, my god. I am so busy. I  
13 work so hard." And just this  
14 frantic nature with her that is just  
15 a bit boring to hear, and exhausting  
16 when you have you a lot of work to  
17 get done. And she is supposed to be  
18 preparing the townhouse. Nothing is  
19 getting done. You are asking  
20 questions, and she is never giving  
21 an answer other than running in  
22 circles, and saying, "Oh, my God. I  
23 am so busy. Oh, my God. I am so  
24 busy." And being inappropriate. So  
25 I always wanted everything

1 T. CHEN

2 documented with her.

3 Q. So during the period  
4 between first meeting Ms. Robinson,  
5 and her resignation in 2019, how  
6 often would you e-mail with Ms.  
7 Robinson in a typical week?

8 A. I rarely ever e-mailed just  
9 with her. Rarely. I always had  
10 somebody else on the e-mail because  
11 I didn't trust her.

12 Q. How often would you e-mail  
13 with Ms. Robinson, or how often  
14 would you send e-mails that included  
15 Ms. Robinson in a typical week?

16 A. I couldn't give you a  
17 number, but it would be several  
18 times a week because she was  
19 supposed to be setting up the home  
20 that I was living in, that she did  
21 not set up.

22 Q. And during the period  
23 between first meeting Ms. Robinson,  
24 and her resignation in April of  
25 2019, how often would you text with

1 T. CHEN

2 Ms. Robinson in a typical week?

3 A. I couldn't give you a  
4 number, but it would be a few times  
5 a week, several times a week.

6 Q. And during that same  
7 period, how often would you interact  
8 with Ms. Robinson in person during a  
9 typical week?

10 A. There was no such thing as  
11 a typical week.

12 Q. Would it be common for you  
13 to interact with Ms. Robinson in  
14 person once a week during that  
15 period of time?

16 A. Interact how?

17 Q. See each other in person?

18 A. It was -- at the beginning  
19 she was coming to the townhouse a  
20 ridiculous amount of times, and  
21 would always try to bring someone  
22 with her where she should say that I  
23 shouldn't be there. So sometimes I  
24 would see her come in, and then she  
25 would have some sort of strange

1 T. CHEN

2 excuse, and I just wanted to respect  
3 the dynamic that was already set so  
4 I would leave. And it would just  
5 be, you know, more than I would like  
6 to see her I was seeing her.

7 Q. Before her employment at  
8 Canal ended, were there periods when  
9 you were in daily communication with  
10 Ms. Robinson?

11 A. No.

12 MS. MACMULLIN: Okay. We  
13 are going to share a document  
14 that is Bates stamped  
15 Robinson 000012273 to 74.  
16 And we will mark this  
17 document as Plaintiff's  
18 Exhibit 70.

19 (Whereupon, Plaintiff's  
20 Exhibit 70, Robinson  
21 000012273 to 74, was marked  
22 for identification, as of  
23 this date.)

24 MR. WARD: 70?

25 MS. MACMULLIN: Thank

1 T. CHEN

2 you.

3 MR. DROGIN: Can we note  
4 the time of day, please?

5 MS. MACMULLIN: I didn't  
6 catch that?

7 MR. DROGIN: Can we note  
8 the time of day?

9 MS. MACMULLIN: It is  
10 10:24 a.m.

11 Mr. Ward, do you need  
12 some time to access the  
13 document?

14 MR. WARD: Sure. I mean,  
15 I haven't received yet in my  
16 e-mail.

17 MS. MACMULLIN: Okay. So  
18 we can go off the record.

19 THE VIDEOGRAPHER: The  
20 time is 10:24 a.m. We can go  
21 off record.

22 (Whereupon, a recess was  
23 taken at this time.)

24 THE VIDEOGRAPHER: The  
25 time is now 10:30 a.m. and we

1 T. CHEN

2 are back on the record.

3 Q. So Ms. Chen, looking at  
4 what has been marked as Plaintiff's  
5 Exhibit 70, around the middle of  
6 this text message, do you see the  
7 line that begins, "He speaks so  
8 glowingly?"

9 A. No. I think we have to  
10 scroll down. Where -- where?

11 Q. Apologies. It is on the  
12 second page of the document.

13 A. I got to move up to the  
14 screen. Yes.

15 Q. Could you please read that  
16 sentence and the next sentence into  
17 the record?

18 A. I went to sit down, sorry.

19 Q. Okay.

20 A. The, he speaks so  
21 glowingly?

22 Q. Yes.

23 A. "He speaks so glowingly of  
24 you and it is nice to see that not  
25 even his most complimentary moments

1 T. CHEN  
2 have done you justice. You're  
3 really as great as he has built you  
4 up to be and then some. Hope you  
5 like the products. I'm making Rose  
6 based serums next week. I'll pass  
7 some along to you. Have a great  
8 weekend."

9 Describe for me what Mr. De  
10 Niro said when he spoke glowingly of  
11 Ms. Robinson?

12 A. He said that he was very  
13 happy that she always seemed to get  
14 the job done, and that was it.

15 Q. What compliments would Mr.  
16 De Niro pay Ms. Robinson?

17 A. I wouldn't say that he ever  
18 paid her compliments at all.

19 Q. Which of Ms. Robinson's  
20 attributes did Mr. De Niro value?

21 A. He never commented on her  
22 having attributes at all.

23 Q. During your employment, did  
24 Mr. De Niro express that he found  
25 Ms. Robinson to be hardworking?

1 T. CHEN

2 A. He never used the words  
3 hardworking.

4 Q. What words did he use to  
5 describe her?

6 A. She acts like she does a  
7 lot. It is a bit crazy, but as long  
8 as the job gets done, I am happy.

9 MS. MACMULLIN: We are  
10 going to share another  
11 document in the chat that is  
12 Bates stamped Robinson  
13 00012120, which we are  
14 marking at Plaintiff's  
15 Exhibit 71.

16 (Whereupon, Plaintiff's  
17 Exhibit 71, Robinson  
18 00012120, was marked for  
19 identification, as of this  
20 date.)

21 Q. Let me know when you are  
22 able to see that, Ms. Chen.

23 A. Okay.

24 MR. DROGIN: Has it been  
25 e-mailed to Counsel?

1 T. CHEN

2 MS. MACMULLIN: I am sure  
3 it will be, if it hasn't yet.

4 MR. WARD: We have it on  
5 the screen.

6 MS. MACMULLIN: Okay.  
7 Thank you.

8 MR. DROGIN: Counsel,  
9 before you start asking  
10 questions, Canal's Counsel  
11 has not yet received it. We  
12 will request that you e-mail  
13 those documents ahead of time  
14 so we don't have to have the  
15 delays either on and off the  
16 record. I just received  
17 something. This is 12273?

18 MS. MACMULLIN: It should  
19 be 12120.

20 MR. DROGIN: So just so  
21 we are clear, it looks like I  
22 just received -- I just  
23 received, at 10:35, the  
24 e-mail that Mr. Margolis sent  
25 however many minutes ago.

1 T. CHEN

2 There is some delay on my end  
3 in receiving these documents.  
4 And I would ask, again, that  
5 you e-mail a couple ahead of  
6 time. We will represent that  
7 we won't open them until you  
8 offer them. But it seems to  
9 be like we are wasting a lot  
10 of time. I would think that  
11 you want to ask more  
12 questions and not wait for  
13 people to receive documents,  
14 but that is up to you. I  
15 have 71. I am downloading  
16 that. Now I just got it from  
17 Jeremy.

18 MS. MACMULLIN: Alright.

19 MR. WARD: This is going  
20 to take forever. This is  
21 going to take beyond the  
22 seven hours. I certainly  
23 hope this is not going to be  
24 seven hours. But we are  
25 looking at much more time

1 T. CHEN

2 than anyone anticipated.

3 There has to be a way where  
4 you can share this on the  
5 screen to avoid the e-mails,  
6 and the downloading of the  
7 documents and the PDF.

8 Have you thought about  
9 that?

10 MS. MACMULLIN: Can we go  
11 off the record?

12 THE VIDEOGRAPHER: The  
13 time is now 10:36 a.m. We  
14 are off the record.

15 (Whereupon, a discussion  
16 was held off the record.)

17 THE VIDEOGRAPHER: The  
18 time is now 10:50 a.m. We  
19 are back on the record.

20 MS. LAZZARO: I just want  
21 to clarify for the record  
22 that this deposition  
23 commenced at 9:30. It is  
24 11:05 now and we have only  
25 been on the record for 44

1 T. CHEN

2 minutes.

3 Q. Ms. Chen, if you could take  
4 a look at Robinson 00012120, which  
5 has been marked as Plaintiff's  
6 Exhibit 71. I would like you to  
7 take a look at your first text  
8 message.

9 What did you observe Ms.  
10 Robinson doing that prompted you to  
11 you write that she was an incredible  
12 human?

13 A. It is something called  
14 killing a person with kindness.

15 Q. What do you mean by that?

16 A. Everything I observed from  
17 her was unprofessional, deranged,  
18 really crazy, aggressive, and angry  
19 all the time. So I realized I  
20 didn't want Bob to lose a person at  
21 the office that he valued so much.  
22 So what I do when I am at my wits  
23 end with a person, and I can't quite  
24 understand what is going on with  
25 them, is that I just try to be very

1 T. CHEN  
2 kind. And that is all I was trying  
3 to do here. And this came after a  
4 whole lot of horrible behavior from  
5 Chase. She -- we would go away and  
6 I came back, she moved furniture  
7 around without asking permission.  
8 She pruned our trees without asking  
9 for permission. It all seemed very  
10 jealous and territorial. And what I  
11 was trying to let her do is no  
12 matter what, your relationship with  
13 Bob is your relationship with Bob  
14 and work. And nothing here in the  
15 household, me, I would not influence  
16 anything in any other way for her  
17 other than supporting what Bob  
18 needs. That was the purpose of this  
19 text.

20 Q. Why did you believe Ms.  
21 Robinson was jealous?

22 A. Say that again?

23 Q. Why did you believe Ms.  
24 Robinson was jealous?

25 A. Well, when you come into

1 T. CHEN  
2 somebody else's household and start  
3 moving around furniture without  
4 their permission, and you text their  
5 boyfriend about what they think  
6 about the change that they have  
7 made, I think that is -- I think  
8 that is you are overstepping. You  
9 are not respecting the boundaries of  
10 our relationship, and you are trying  
11 to step in a place that you  
12 shouldn't be. When you come to the  
13 townhouse and your boss asks you  
14 what is on the schedule today, and  
15 you turn to me, and roll your eyes,  
16 and go, "Oh, my God. He is just so  
17 annoying. I can't stand dealing  
18 with him," I saw that that was very  
19 weird and oddly spoken since I am  
20 the girlfriend and she is an  
21 assistant. When we -- when she is  
22 hiring housekeepers for us, and I  
23 speak to the housekeepers that I  
24 hire, and when they ask about me,  
25 and they say, "What is his

1 T. CHEN  
2 girlfriend like?" When Ms. Robinson  
3 tells them, "Don't worry about her.  
4 We are going to get rid of her." I  
5 do think that is jealousy. She  
6 doesn't want me around. When she  
7 instructs the assistant that she  
8 hired to work at the townhouse  
9 because she said she couldn't handle  
10 the workload. When she instructs  
11 the assistant to not speak to me,  
12 and tells her that I am the enemy, I  
13 realize that she must be jealous. I  
14 also realize that she must be crazy  
15 when she tells the assistant she  
16 hired that she was hired to protect  
17 Bob from being audited. And to  
18 protect him from being audited, Ms.  
19 Robinson would have stacks of  
20 receipts of all of the things that  
21 she bought on the company card, at  
22 her house, and had this assistant go  
23 on a computer and match each  
24 purchase to whatever store to the  
25 receipt, and staple it, and to

1 T. CHEN  
2 instruct this assistant that her job  
3 is to do this, to protect him from  
4 an audit, I know that she is not  
5 only jealous, I know there is  
6 something wrong with her because you  
7 cannot protect a person from an  
8 audit by stapling photos of  
9 purchases to the receipts.

10 Q. Why did you believe Ms.  
11 Robinson -- let me restate that.

12 Did you believe that Ms.  
13 Robinson was jealous of your  
14 relationship with Mr. De Niro?

15 A. I believe that Ms. Robinson  
16 was jealous of everyone's  
17 relationship with Mr. De Niro.

18 Q. And why did you believe  
19 that?

20 A. Because she spoke ill of  
21 everyone. She hated everyone. She  
22 was nasty to everyone. She was rude  
23 to everyone, including his children.

24 Q. Did you believe that Ms.  
25 Robinson was jealous of your

1 T. CHEN

2 romantic relationship with Mr. De  
3 Niro?

4 A. I cannot answer that. I  
5 don't know what she interprets as a  
6 romantic relationship. She is a  
7 very strange individual.

8 Q. Did you perceive Ms.  
9 Robinson to be jealous of your  
10 romantic relationship with Mr. De  
11 Niro?

12 A. Again, I do not know how  
13 she defines romantic relationship.  
14 And it is none of her business.

15 Q. I am asking about your  
16 perception.

17 Did you perceive that Ms.  
18 Robinson was jealous of your  
19 romantic relationship with Mr. De  
20 Niro?

21 A. Again, I do not know Ms.  
22 Robinson well enough to know how she  
23 defines romantic. So I do not feel  
24 comfortable answering your question.

25 Q. Turning back to your text

1 T. CHEN

2 message, you wrote, "Bob and I can't  
3 stop marvelling --"

4 MS. LAZZARO: I believe  
5 your audio is out. We can't  
6 hear you.

7 MS. MACMULLIN: Can you  
8 hear me now?

9 MS. LAZZARO: Yes.

10 Q. Turning back to your text  
11 message, where you wrote, "Bob and I  
12 can't stop marvelling at what an  
13 amazing effort you always manage to  
14 accomplish."

15 What did Mr. De Niro say  
16 when he was marvelling at Ms.  
17 Robinson?

18 A. Nothing. I made that up  
19 because the relationship between him  
20 and Ms. Robinson had become distant.  
21 He had been telling me that all she  
22 does is complain and whine, and  
23 doesn't have a direct answer for  
24 anything. And she is complaining  
25 about me all the time, and

1 T. CHEN

2 complaining -- just complaining  
3 constantly. He didn't say that at  
4 all.

5 Q. What did you observe Ms.  
6 Robinson doing that prompted you to  
7 write that she was hardworking?

8 A. What I observed was that  
9 she was behaving like a lunatic.  
10 And I knew from the past Bob had  
11 told me she had always gotten what  
12 she needed done in the office. So  
13 what I was trying to do was bring  
14 her back to that hard work. And I  
15 was trying to remind her to get back  
16 to hard work because you are getting  
17 back to just playing very hard  
18 games. And there is no place for  
19 games in the work place or in my  
20 home.

21 Q. What did you observe Ms.  
22 Robinson doing that prompted you to  
23 write that she was intelligent?

24 A. Nothing. I said it just  
25 because she had been acting so

1 T. CHEN

2 unintelligent that I felt if I threw  
3 these certain words out there it  
4 would remind her that she better get  
5 back to just focusing on her job and  
6 doing the right thing.

7 Q. What did you observe Ms.  
8 Robinson doing that prompted you to  
9 write that she went above and  
10 beyond?

11 A. She went above and beyond  
12 to make everybody's lives miserable.  
13 That is actually what I really  
14 meant. It was a touch of sarcasm.  
15 But I was also trying to remind her  
16 that you are going above and beyond,  
17 and you are not going above and  
18 beyond in the right way right now.

19 Q. What aspect of Ms.  
20 Robinson's job did you want her to  
21 focus on completing?

22 A. I actually -- at this point  
23 -- you are talking about at this  
24 point in time?

25 Q. Yes.

1 T. CHEN

2 A. So at this point in time  
3 all I actually wanted her to do was  
4 to get out the townhouse and go back  
5 to the office because she was  
6 becoming very aggressive and  
7 annoying to have in the house. And  
8 she was being disrespectful in my  
9 home, to my family, and rearranging  
10 things in the house. And arguing  
11 with what furniture I wanted sent  
12 back Upstate, was not something that  
13 I wanted in my home. I wanted her  
14 out of my home, and I wanted her  
15 back in the office, and she would  
16 not go. She would -- it was  
17 impossible to get her out.

18 Q. If we look at your second  
19 text message on this page, a few  
20 lines down, do you see it is about  
21 midway through a sentence, it  
22 starts, "I just want to let you  
23 know?"

24 A. Hold on. Yeah.

25 Q. Can you please read that

1 T. CHEN

2 line into the record?

3 MR. WARD: I am going to  
4 object. Ms. MacMullin, this  
5 is not a way to ask a  
6 question to have her read it  
7 into the record. It creates  
8 the appearance that things  
9 are taken out of context. If  
10 you have a specific question  
11 related to that specific  
12 line, you should reference  
13 that line, and ask her the  
14 question. I am not going to  
15 allow her to read a document  
16 -- portions of a document  
17 into the record.

18 Q. Where you write, "I just  
19 want to let you know that you are  
20 the one person from the very  
21 beginning that Bob always speaks so  
22 highly of and appreciate so much. I  
23 have always had highest praise,  
24 appreciation, and gratitude from  
25 you."

1 T. CHEN

2 What did Mr. De Niro say  
3 when he spoke highly of Ms.  
4 Robinson?

5 A. He said that she is a bit  
6 crazy, she rambles on about  
7 nonsense, but at the end of the day  
8 things seem to get done. And it  
9 seems as though she makes it look  
10 like it is her that does it, so I  
11 believe it, and I just need the work  
12 to get done.

13 Q. What did Ms. Robinson get  
14 done for Mr. De Niro that he valued?

15 MS. LAZZARO: Objection  
16 to the form.

17 THE WITNESS: Excuse me?

18 MR. WARD: You can  
19 answer.

20 THE WITNESS: Somebody  
21 just said something.

22 MR. DROGIN: It was an  
23 objection to the form. I  
24 think because there is no  
25 time period. At what point

1 T. CHEN

2 in time are you talking

3 about? That was the basis of

4 the objection to the form.

5 Q. During the period of time  
6 from when Ms. Chen met Ms. Robinson,  
7 to her resignation at Canal, what  
8 did Ms. Robinson get done for Mr. De  
9 Niro that he valued?

10 A. Okay.

11 During the time I met her?

12 Q. During the timeframe of  
13 when you met her to her resignation?

14 A. Nothing. Nothing except  
15 complaints, trouble, problems, all  
16 the time. All across the board  
17 during that period. And he even  
18 said, he was like, "She used to be  
19 on top of stuff, but now it is just  
20 a mess. It is a disaster."

21 And all she does is answer  
22 back, yell at him, yell at everyone.  
23 And that is also why I wanted her  
24 out of the house. I don't -- I  
25 don't allow anybody to yell at my

1 T. CHEN  
2 household, or anybody doing work in  
3 my household. They work with me.  
4 They work with us. And somehow she  
5 thought she was above everyone and  
6 that she could just telling  
7 everybody off, switch paintings  
8 around whenever she wanted. It was  
9 really -- she -- it was literally  
10 like she had lost her mind from what  
11 I had heard before. There was  
12 nothing good that was said about her  
13 during that period.

14 MS. MACMULLIN: We are  
15 going to turn to the next  
16 document, which is Bates  
17 stamped Canal 0047500 to 02,  
18 which we will mark as  
19 Plaintiff's Exhibit 72.

20 (Whereupon, Plaintiff's  
21 Exhibit 72, Canal 0047500 to  
22 02, was marked for  
23 identification, as of this  
24 date.)

25 MS. WARD: I'm sorry, Ms.

1 T. CHEN

2 MacMullin. Say that again?

3 What number are you talking

4 about?

5 MS. MACMULLIN:

6 Canal\_0047500.

7 MR. WARD: Okay. I

8 thought it would have --

9 THE WITNESS: It is not

10 in chronological order.

11 MR. WARD: Yeah. I

12 thought it would come to us

13 in chronological order. It

14 did not, so let me --

15 MS. MACMULLIN: It should

16 be in Bates order, I believe.

17 MR. WARD: Yeah. The

18 first form I have is nine.

19 We printed it in a way that

20 it was presented to us.

21 47500 --

22 MS. MACMULLIN: 02.

23 MR. WARD: I am trying to

24 find 002475 what?

25 MS. MACMULLIN: 02.

1 T. CHEN

2 MR. WARD: Okay. Got it.

3 MS. MACMULLIN: Thank  
4 you.

5 MR. WARD: This is  
6 exhibit number?

7 MS. MACMULLIN: 72.

8 Q. So Ms. Chen, turning to the  
9 second page of this document, do you  
10 see at 4:29 p.m. where you write,  
11 "The pups were shook up, but Chase  
12 took care of them first and was  
13 amazing?"

14 A. Uh-huh.

15 Q. What did Ms. Robinson do  
16 that was amazing?

17 A. Actually, nothing. Because  
18 she refused to give the security  
19 code for our house. So if there was  
20 a problem I couldn't access the  
21 security pad and the security panel.  
22 And for some really weird reason she  
23 put herself on as the contact for  
24 the security company when she does  
25 not live with us and she does not

1 T. CHEN  
2 live already there. So when there  
3 was -- I was cooking, and it turned  
4 into a disappointing disaster.  
5 Instead of calling me, the alarm  
6 company had to call her, and she had  
7 to go to the townhouse and, you  
8 know, do what she needed to do  
9 because I wasn't put on it. I could  
10 have gotten to the townhouse much  
11 sooner. There was a bit of a delay.  
12 I was just relieved that my puppies  
13 were okay because she had been very  
14 nasty to them any time she was in  
15 front of me, which really really  
16 upset in my house. I always feared  
17 that if I wasn't there she would  
18 mistreat my pets. But I did see on  
19 the cameras that the first thing she  
20 did was put my babies outside. So I  
21 was very grateful and happy for that  
22 in spite of the fact that she had  
23 really messed with the safety of my  
24 house by putting herself on the --  
25 the alarm company's call list and

1 T. CHEN

2 not giving Bob or I the codes.

3 Q. And on this occasion you  
4 had left the house while there was  
5 food cooking on the stove, is that  
6 correct?

7 A. There was something on the  
8 stove. Probably it was -- yeah,  
9 there was something on the stove.

10 Q. A little lower down on the  
11 document, at 4:30 p.m., where you  
12 write, "Because she knows how to fix  
13 disasters and I know how to create  
14 them," were you referring to Ms.  
15 Robinson?

16 A. Yes.

17 Q. What did you mean that Ms.  
18 Robinson knew how to fix disasters?

19 A. Well, she is really good at  
20 making them, and setting people up  
21 for them like she set me up at the  
22 townhouse for that disaster without  
23 giving Bob or I the alarm codes. So  
24 she is very good at creating messes.  
25 And this mess she was very good at

1 T. CHEN

2 fixing because I saw that my puppies  
3 were taken care of first.

4 Q. So when you wrote that Ms.  
5 Robinson knows how to fix disasters,  
6 you meant that she knew how to  
7 create disasters?

8 A. No. That is not what I  
9 meant when I wrote that. I don't  
10 understand what you are saying.

11 Q. So what was the basis for  
12 your statement that Ms. Robinson  
13 knew how to fix disasters?

14 MR. WARD: Objection.

15 Asked and answered. Go  
16 ahead. You can answer it  
17 again.

18 A. What I was actually saying  
19 is that there was something that  
20 happened in the townhouse, it got  
21 rectified. But if you want to look  
22 deeper into it, she does make all  
23 the problems. She makes all the  
24 problems that happen all the time,  
25 and then she tries to act like, oh,

1 T. CHEN

2 she fixed it. What can artists do.

3 Q. Turning to the bottom of  
4 this page, where you write, "Genius  
5 thinking on Chase for calling to  
6 notify the doctor's office."

7 What did Ms. Robinson do  
8 that caused you to write that she  
9 displayed genius thinking?

10 A. How are you defining genius  
11 thinking?

12 Q. However you were using  
13 those words in this text message?

14 A. So maybe I should define it  
15 for the record. It was sarcasm.  
16 The doctor's office is located on  
17 the lower level of our townhouse.  
18 So there was a fire that happened  
19 because Ms. Robinson would never  
20 give us the alarm information or the  
21 pass codes, and didn't have any of  
22 us as the people to call. So yes, I  
23 was being sarcastic because you  
24 would have to notify the doctor's  
25 office. They are in the same

1 T. CHEN

2 building. She created a huge mess.

3 Q. Okay.

4 MS. MACMULLIN: We are  
5 going to turn now to a  
6 document that is Bates  
7 stamped Robinson 00098953,  
8 which we will mark as  
9 Plaintiff's Exhibit 73.

10 (Whereupon, Plaintiff's  
11 Exhibit 73, Robinson 0008953,  
12 was marked for  
13 identification, as of this  
14 date.)

15 MR. WARD: Is it 0048953?

16 MS. MACMULLIN: No, it is  
17 0008953.

18 MR. WARD: Again, they  
19 are not presented in the  
20 order in which you are -- how  
21 many pages?

22 MS. MACMULLIN: It is one  
23 page.

24 MR. WARD: I think this  
25 is Plaintiff's Exhibit 73?

1 T. CHEN

2 MS. MACMULLIN: Yes.

3 Q. So Ms. Chen, do you  
4 recognize this as a text exchange  
5 between yourself and Ms. Robinson?

6 A. Yes.

7 Q. And do you see towards the  
8 bottom of the page where you write,  
9 "Thank you so much. You really are  
10 such an angel?"

11 A. Uh-huh. Yes.

12 Q. What did Ms. Robinson do  
13 that prompted you to call her an  
14 angel?

15 A. What is your definition of  
16 angel?

17 Q. It is your term, Ms. Chen.

18 A. Yeah. I was saying  
19 actually asshole. I was killing it  
20 with kindness. I was very pissed.  
21 She did nothing. Nothing to prevent  
22 anything happening in our home. She  
23 did everything to make sure  
24 everything was a disaster. When you  
25 move into a house and there is a

1 T. CHEN  
2 security system set up by an  
3 assistant, Ms. Robinson, she is  
4 supposed to give you all of the pass  
5 codes. She is supposed to put the  
6 people living in the house on the  
7 call list. She did not do that.  
8 She is not an angel. She is an  
9 asshole.

10 MS. MACMULLIN: We are  
11 going to now move to a  
12 document that is Bates  
13 stamped Canal 0048753 to 754.  
14 We will mark this as  
15 Plaintiff's Exhibit 74.

16 (Whereupon, Plaintiff's  
17 Exhibit 74, Canal 0048753 to  
18 754, was marked for  
19 identification, as of this  
20 date.)

21 MR. DROGIN: 48735?

22 MS. MACMULLIN: 48753.

23 Sorry.

24 MR. DROGIN: Got it. 74?

25 MS. MACMULLIN: Yes. 74.

1 T. CHEN

2 MR. WARD: Okay.

3 Q. Ms. Chen, this is a text  
4 exchange between yourself and Mr. De  
5 Niro. Turning to the second page?

6 A. It is?

7 MR. WARD: What we have  
8 in front of us is 004704 --  
9 no.

10 MS. MACMULLIN: It should  
11 be 0048753.

12 MR. WARD: 48753.  
13 Gotcha.

14 Q. And turning to the second  
15 page of the document, do you see  
16 your text message which reads, "You  
17 the know the first thing that Chase  
18 did was take care of the boys. I  
19 saw it on the cameras. That means  
20 everything to me. Her heart is  
21 really good?"

22 A. Uh-huh.

23 Q. What did Ms. Robinson do  
24 that prompted you to write this  
25 message?

1 T. CHEN

2 A. It was after the -- the  
3 fire department had to come because  
4 she did not put me on the call list.  
5 She set me up for disaster. And the  
6 one thing I was really happy about  
7 because she was always very nasty to  
8 my puppies from when they were  
9 brought home, was that I saw on the  
10 cameras that she took care of them.  
11 So in that moment everything that I  
12 had felt about her, that was out of  
13 frustration and constant nastiness  
14 from her, had subsided for that  
15 moment. That is all I have to say.  
16 For that moment is how I felt.

17 Q. Were you being sincere in  
18 that moment when you wrote that her  
19 heart is really good?

20 A. Can I define how I meant  
21 it?

22 Q. Sure.

23 A. Her heart was good in that  
24 moment, that she took care of the  
25 babies. That is it.

1 T. CHEN

2 Q. Okay.

3 MS. MACMULLIN: We are  
4 now moving to a document that  
5 is Bates stamped Canal  
6 0046210, which we will mark  
7 as Plaintiff's Exhibit 75.

8 (Whereupon, Plaintiff's  
9 Exhibit 75, Canal 0046210,  
10 was marked for  
11 identification, as of this  
12 date.)

13 MR. WARD: Give me the  
14 Bates stamp again, please?

15 MS. MACMULLIN: Yes. It  
16 is Canal 0046210.

17 MR. WARD: Okay.

18 Q. Do you recognize this  
19 document, Ms. Chen?

20 A. Yes.

21 Q. What prompted you to send  
22 flowers to Ms. Robinson?

23 A. Bob told me it was her  
24 birthday.

25 Q. And why did you send her

1 T. CHEN

2 such a large flower arrangement?

3 A. It was an act of trying to  
4 kill her with kindness because she  
5 was miserable from the moment she  
6 met me. And I could tell that she  
7 was -- she was out of sorts  
8 constantly and constantly short  
9 circuiting. So I thought this was  
10 an opportunity to do something nice.  
11 I thought maybe if I did something  
12 nice, she would cut the shit out,  
13 and just chill out finally, and do  
14 her job.

15 Q. Do you like having flowers  
16 around your home?

17 A. Not really.

18 Q. Was it a regular occurrence  
19 for to you have flowers in the home  
20 that you shared with Mr. De Niro?

21 A. No.

22 Q. Would Ms. Robinson ever  
23 bring flowers to the home that you  
24 shared with Mr. De Niro?

25 A. She would do weird stuff.

1 T. CHEN

2 I think maybe around Christmas she  
3 was trying to decorate a little too  
4 much, but I can't recall other than  
5 that.

6 Q. We are --

7 A. And decorate in my home.  
8 In my private home, which was  
9 inappropriate.

10 MS. MACMULLIN: We are  
11 sharing a document now that  
12 is Bates stamped Robinson  
13 00012055, which we are  
14 marking as Plaintiff's  
15 Exhibit 76.

16 (Whereupon, Plaintiff's  
17 Exhibit 76, Robinson  
18 00012055, was marked for  
19 identification, as of this  
20 date.)

21 MR. WARD: Give that to  
22 me again?

23 MS. MACMULLIN: Yes.  
24 Robinson 00012055.

25 MR. WARD: Okay.

1 T. CHEN

2 Q. And Ms. Chen, do you  
3 recognize this as a text exchange  
4 you had with Ms. Robinson?

5 A. Yep.

6 Q. Looking at the line that  
7 says, "With all the entertaining  
8 going on here, we ended up needing  
9 more cleaning supplies and garbage  
10 bags, which got us to talking about  
11 when we get a housekeeper, and the  
12 fact that you do absolutely  
13 everything, and what made sense  
14 going forward." Or "moving  
15 forward." Sorry.

16 What did you mean when you  
17 wrote, "You do absolutely  
18 everything?"

19 A. She does absolutely  
20 everything to constantly claim  
21 possession over the townhouse, and  
22 she is very rude about it. Would  
23 even get angry about things that I  
24 moved around in my own house which  
25 that I thought was nuts.

1 T. CHEN

2 Q. Describe all of the job  
3 responsibilities that you were aware  
4 of Ms. Robinson performing for Mr.  
5 De Niro?

6 A. She is his assistant. She  
7 is supposed to do what an assistant  
8 does in the office.

9 Q. Beginning in 2018, Ms.  
10 Robinson became involved in setting

11 [REDACTED]  
[REDACTED]

13 A. Yes.

14 Q. And was this a home that  
15 Mr. De Niro rented?

16 A. Yes.

17 Q. Does your name appear on  
18 the lease?

19 A. I don't know.

20 Q. And this is the home that  
21 you currently reside in with Mr. De  
22 Niro, correct?

23 A. Yes.

24 Q. Describe for me Ms.  
25 Robinson's job responsibilities with

1 T. CHEN

2 respect to setting up the townhouse

3 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

4 A. I can't answer that  
5 question. I never was given a list  
6 of things that she was supposed to  
7 do at the townhouse. All I know is  
8 that she was always overly imposing  
9 at the townhouse.

10 Q. Ms. Robinson was assigned  
11 to buy household supplies for the  
12 townhouse, correct?

13 A. I don't know. By who?

14 Q. Were you aware of Ms.  
15 Robinson buying household supplies  
16 for the rental home?

17 A. I was aware of Ms.  
18 Robinson's overspending and buying a  
19 lot of things that were not  
20 necessary for my home, and never  
21 checking with me, even though she  
22 was instructed to.

23 Q. By whom was she instructed  
24 to check with you?

25 A. Her boss.

1 T. CHEN

2 Q. So was Ms. Robinson  
3 assigned to buy household supplies  
4 for Mr. De Niro's rental home?

5 A. I don't know if they had  
6 that conversation. But what Ms.  
7 Robinson would always do is she  
8 would volunteer to do everything all  
9 the time, especially in the home.  
10 And she would even suggest to do  
11 more things in the home, and do more  
12 things at the children's homes,  
13 which were not her immediate job  
14 responsibilities.

15 Q. Was Ms. Robinson tasked  
16 with coordinating deliveries to Mr.  
17 De Niro's rental home?

18 A. Yes.

19 Q. Was Ms. Robinson tasked  
20 with sourcing options to decorate  
21 Mr. De Niro's rental home?

22 A. Yes.

23 Q. Was Ms. Robinson tasked  
24 with doing laundry at Mr. De Niro's  
25 rental home?

1 T. CHEN

2 A. Absolutely not.

3 As a matter of fact, there  
4 was a housekeeper coming in who was  
5 not doing our laundry, our clothes,  
6 and our towels. And I found out  
7 from her that Ms. Robinson had  
8 instructed her not to wash any of my  
9 things, or any of Bob's clothes.  
10 Just to do all the towels and the  
11 sheets that Ms. Robinson would  
12 instruct her to do.

13 Q. So at times Ms. Robinson  
14 did do laundry at Mr. De Niro's  
15 rental home?

16 A. I never saw her do that.  
17 She always sort of bragged about  
18 directing my housekeeper to do her  
19 work, or what she claimed to be her  
20 work. Or she didn't even say it was  
21 her work. She would just act like  
22 it was her house. And just said,  
23 "Well, I had Adrianna (ph) do this."  
24 Because I said to her -- I told Bob,  
25 "She is not cleaning the laundry.

1 T. CHEN

2 She is not cleaning our clothes.

3 What is going on?" He said, "Well,

4 talk to Chase." I said, "Something

5 weird is going on. There is just

6 piles of clean towels, piles of

7 sheets." And when I spoke to Chase

8 she was very arrogant, not nice, and

9 said that she directed her to do all

10 the sheets and towels and not our

11 stuff.

12 Q. When was the housekeeper

13 first hired for Mr. De Niro's rental

14 home?

15 A. We have had a housekeeper

16 from the beginning, but I can't

17 remember what date exactly. It is

18 like within the first couple of

19 weeks we had somebody there, and

20 then we had eventually more people

21 that we had hired.

22 Q. At what point was the

23 rental home fully staffed with

24 household staff?

25 A. What do you consider fully

1 T. CHEN

2 staffed with household staff?

3 Q. What household staff did  
4 you and Mr. De Niro eventually hire?

5 A. When?

6 Q. At any point during time  
7 that you have lived in the home?

8 A. That is a very broad  
9 question. We have been there for a  
10 couple of years.

11 Q. Well, during the period of  
12 Ms. Robinson's employment, what  
13 household staff did you and Mr. De  
14 Niro hire?

15 A. We hired housekeepers who  
16 all had to have been let go because  
17 they were crazy. And I was going to  
18 hire a house assistant that Ms.  
19 Robinson was pushing on me. And she  
20 always put people through a  
21 ridiculous interview process, would  
22 tell them come in three to four  
23 times for meetings with her. Where  
24 they all told me all she did was  
25 talk about herself and how much work

1 T. CHEN

2 she did. Basically everything she  
3 would do with us she would be in  
4 these interviews. Talk about  
5 herself, talk about how busy she is,  
6 and she works for a very  
7 high-profile man. Constantly  
8 saying, "High-profile, high-profile,  
9 high-profile," and then just  
10 rambling on about herself. And I --  
11 there was one assistant she was  
12 really pushing on me. She  
13 interviewed him about three to four  
14 times. I had a background check on  
15 him. He didn't check out good so I  
16 couldn't go through with the hire.

17 Q. You were not present in  
18 those interviews with Ms. Robinson  
19 and potential housekeepers, correct?

20 A. No, I think that is why she  
21 spoke sparingly about me.

22 Q. When you and Mr. De Niro  
23 encountered mice in your townhouse,  
24 you turned to Ms. Robinson to  
25 address that situation, correct?

1 T. CHEN

2 A. I wouldn't say we.

3 Q. What would you say?

4 A. We looked at each other and  
5 said, "We need an exterminator."

6 Q. And was Ms. Robinson  
7 involved in coordinating that  
8 exterminator?

9 A. Actually, I don't really  
10 think so. It was more Michael  
11 Kaplan that was doing it then. I  
12 remember dealing myself with Michael  
13 when it came to that because we were  
14 concerned with the puppies. And she  
15 had been so nasty with my dogs I was  
16 always so afraid she was going to do  
17 something behind my back to him. So  
18 I didn't -- I did not want her  
19 involved with anything where there  
20 could be rat poison or rat traps  
21 around.

22 Q. Ms. Robinson was tasked  
23 with tracking down a throw pillow  
24 for your bedroom?

25 A. Is that a question or a

1 T. CHEN

2 statement? I don't understand what  
3 you are saying.

4 Q. It is a question. Ms.  
5 Robinson was assigned to track down  
6 a throw pillow for your bedroom,  
7 correct?

8 A. I don't know. She inserted  
9 herself into everything in the  
10 townhouse. She wasn't tasked with  
11 things. She would task herself, and  
12 then argue with me when I would say  
13 that it is unnecessary.

14 Q. When you and Mr. De Niro  
15 needed a maid, Ms. Robinson was  
16 tasked to assist in finding one, is  
17 that correct?

18 A. It was actually Michael  
19 Kaplan that found us someone first,  
20 and then it was Chase volunteering  
21 to set up interviews with  
22 housekeepers. And then when I would  
23 interview them, I found out from a  
24 couple of the housekeepers when they  
25 had asked about me, that Ms.

1 T. CHEN

2 Robinson said, "You don't need to  
3 worry about her. We are going to  
4 get rid of her." I heard it from  
5 more than one person.

6 Q. Who told you that?

7 A. Raquel McBroom (ph).

8 Q. Anyone else?

9 A. Another old housekeeper,  
10 May. But I don't remember her last  
11 name.

12 Q. And who is Raquel McBroom?

13 A. She is a housekeeper that  
14 works for Toukie.

15 Q. When you and Mr. De Niro  
16 needed a house manager, was Ms.  
17 Robinson tasked to vet candidates?

18 A. She found someone who she  
19 interviewed several times. I had a  
20 background check on him. It came  
21 back not good, so we didn't go with  
22 him. I found somebody else, and  
23 when she found out that I was hiring  
24 someone else, she had instructed  
25 Michael Kaplan to FaceTime her to

1 T. CHEN

2 gossip about my new assistant, and  
3 to get all the details necessary,  
4 which was none of her business.  
5 That was my home. Not hers.

6 Q. Ms. Robinson assisted in  
7 coordinating the new closets in Mr.  
8 De Niro's rental home, correct?

9 A. Yes.

10 Q. Ms. Robinson assisted in  
11 selecting towels for Mr. De Niro's  
12 rental home, correct?

13 A. There was an interior  
14 designer who did that.

15 Q. Ms. Robinson assisted with  
16 ordering vacuums for Mr. De Niro's  
17 rental home, correct?

18 A. And Michael Kaplan.

19 Q. Ms. Robinson ordered vacuum  
20 bags for Mr. De Niro's rental home?

21 A. That is a such a strange  
22 weird little detail. I would think  
23 that if you order vacuums, it would  
24 be a logical assumption that maybe I  
25 should order some bags. I mean,

1 T. CHEN

2 perhaps she did. I don't have time  
3 in my life to go over these details.

4 Q. Ms. Robinson ordered  
5 mattress sanitizers for Mr. De  
6 Niro's rental home, correct?

7 A. I don't know. What is a  
8 mattress sanitizer?

9 Q. Ms. Robinson ordered  
10 mattress pads for Mr. De Niro's  
11 rental home, is that correct?

12 A. I believe there was an  
13 interior designer that was helping  
14 with all of that, and Chase was  
15 constantly inserting herself to take  
16 over those tasks. She is very pushy  
17 about that. It's not that she is  
18 ever assigned. She is always like,  
19 "I want to do it. I will do it. I  
20 will take care of that." You don't  
21 have a minute to even breathe or  
22 think, because she is like, "I, I,  
23 I, I, I."

24 Q. Ms. Robinson ordered air  
25 purifiers for Mr. De Niro's rental

1 T. CHEN

2 home, correct?

3 A. I can't remember those  
4 minute details. I just know that  
5 every time we needed anything, or  
6 there was anything that had to be  
7 purchased, she was very quick to use  
8 the credit card.

9 Q. Ms. Robinson set up  
10 passwords for your WiFi and other  
11 devices, correct?

12 A. Yeah. That she would not  
13 give to us. So I would have to go  
14 through Michael Kaplan.

15 Q. Ms. Robinson was tasked  
16 with walking your dogs, correct?

17 A. Never. She was so nasty  
18 when I got them. I would never ever  
19 want her around them.

20 Q. On one occasion you asked  
21 Ms. Robinson to assist with your  
22 neighbor's plants, correct?

23 A. No. She came into our  
24 house when we were on vacation,  
25 moved our furniture around, and

1 T. CHEN  
2 pruned our plants without asking us.  
3 Without letting us know she was  
4 going to be in the house. She is  
5 crazy. She doesn't ask permission  
6 for anything. She inserts herself.  
7 And you can't get rid of her. And  
8 she is rude and obnoxious.

9 Q. Ms. Robinson put together a  
10 guide for Mr. De Niro's rental home,  
11 correct?

12 A. It was not a guide.

13 Q. What was it?

14 A. It was three pieces of  
15 paper that had -- it didn't even  
16 have the information on it. It was  
17 three pieces of paper, with people's  
18 names next to it to contact without  
19 phone numbers. Some places had  
20 phone numbers. When we tried to  
21 even locate the land lady's  
22 handyman, she gave us the number one  
23 digit off. And I remember Michael  
24 Kaplan saying, "Yeah. This is  
25 something that Chase normally does."

1 T. CHEN

2 She withholds information. She  
3 wouldn't even -- I needed to get  
4 extra keys made at the house. She  
5 wouldn't even give me the car keys  
6 to go do it myself. She wanted to  
7 hold onto everything at the  
8 townhouse to insert herself into  
9 everything that she was not asked to  
10 be inserted into. She was not  
11 assigned tasks. She took them on  
12 herself.

13 MS. MACMULLIN: We are  
14 going to turn to a document  
15 that has been Bates stamped  
16 Robinson 00014404, which we  
17 will mark as Plaintiff's  
18 Exhibit 77.

19 (Whereupon, Plaintiff's  
20 Exhibit 77, Robinson  
21 00014404, was marked for  
22 identification, as of this  
23 date.)

24 Q. Do you have that document  
25 in front of you, Ms. Chen?

1 T. CHEN

2 A. Yes.

3 Q. On the first line, where  
4 you write, "Thank you for always  
5 being so thorough."

6 A. Uh-huh.

7 Q. Did you observe Ms.  
8 Robinson to be thorough in the  
9 performance of her duties regarding  
10 the 117A townhouse?

11 A. I'm sorry. I didn't hear  
12 what you said. The end part you cut  
13 off.

14 Q. Did you observe Ms.  
15 Robinson to be thorough in the  
16 performance of her duties regarding  
17 the 117A townhouse?

18 A. Absolutely not.

19 Q. Why did you write this?

20 A. I was killing her with  
21 kindness because she was becoming  
22 more and more difficult, and I felt  
23 that she was jealous and felt  
24 threatened. So I was trying to be  
25 kind, to let her know, there is no

1 T. CHEN  
2 jealousy. You are not threatened.  
3 Go back to being thorough in the way  
4 that I understood you to be thorough  
5 before I met you because of the what  
6 Bob had just said. That is weird,  
7 she is crazy, she rambles on, but  
8 she seems to get things done and  
9 that is all I need."

10 MS. MACMULLIN: We are  
11 going to turn now to a  
12 document that is Bates  
13 stamped Canal 0048652 through  
14 657, which we will mark as  
15 Plaintiff's Exhibit 78.

16 (Whereupon, Plaintiff's  
17 Exhibit 78, Canal 0048652  
18 through 657, was marked for  
19 identification, as of this  
20 date.)

21 MR. WARD: Through 6  
22 what?

23 MS. MACMULLIN: 657.

24 Q. And Ms. Chen, this is a  
25 text conversation between yourself

1 T. CHEN

2 and Mr. De Niro. If you turn to  
3 page three of the document?

4 A. Uh-huh.

5 Q. Right at the bottom, at  
6 8:32, you write, "I might need you  
7 to respond to the e-mail" -- oh,  
8 sorry. 8:32 p.m.?

9 A. I got it.

10 Q. "I might need you to  
11 respond to the e-mails I sent out by  
12 asking your people to answer what  
13 has been asked. They haven't  
14 responded to any of them. Your  
15 voice is the only one that bellows  
16 enough to get a response from them."

17 Do you see that?

18 A. Yes.

19 Q. Did you ever hear Mr. De  
20 Niro bellowing at Ms. Robinson?

21 A. How do you define bellow?

22 Q. It is your term, Ms. Chen.

23 A. So that would be my  
24 definition?

25 Q. Yes.

1 T. CHEN

2 A. I am going to state my  
3 definition for the record. I meant  
4 bellow as in presence. He is the  
5 only one that has a tone. He is the  
6 boss. So he has the voice that they  
7 listen to. And he is just very  
8 straightforward in his delivery.  
9 And she always was buying for his  
10 attention so much that I knew if he  
11 had just -- if he gives her a little  
12 bit more attention, that that is  
13 what she is like salivating for. It  
14 would help things move forward.

15 Q. Did you ever hear Mr. De  
16 Niro raise his voice with Ms.  
17 Robinson?

18 A. Nope.

19 MS. MACMULLIN: We are  
20 going to move now to a  
21 document that is Bates  
22 stamped Canal 0048687 and  
23 that goes through -- it goes  
24 through 8690. We are marking  
25 this document as Plaintiff's

1 T. CHEN

2 Exhibit 79.

3 (Whereupon, Plaintiff's  
4 Exhibit 79, Canal 0048687 to  
5 8690, was marked for  
6 identification, as of this  
7 date.)

8 MR. DROGIN: I have it  
9 going through 48692. I think  
10 you said 90.

11 MS. MACMULLIN: I maybe  
12 don't have the rest of the  
13 pages in front of me. But I  
14 will take your  
15 representation.

16 MR. DROGIN: It is like  
17 pictures of chandeliers --  
18 chandelier. It looks like  
19 some plates.

20 MS. MACMULLIN: Yes.

21 MR. WARD: Are we going  
22 through 692?

23 THE WITNESS: This says,  
24 "690." We are on 687 to 690?

25 MS. MACMULLIN: Mr.

1 T. CHEN

2 Drogin just said it goes  
3 through 692.

4 THE WITNESS: Okay.

5 Q. So Ms. Chen, that is a text  
6 conversation between you and Mr. De  
7 Niro. If you look at the first  
8 page, at the bottom.

9 A. Yes.

10 (Whereupon, a discussion  
11 was held off the record.)

12 Q. So Ms. Chen looking at the  
13 first text message at 1:00 a.m.?

14 A. Yes.

15 Q. About six lines down, you  
16 write, "And I don't need to hear  
17 anymore about how Helen should pick  
18 the tree. She's so out of line and  
19 lost in her fantasy. She talks like  
20 she's the stepmother."

21 A. Yes.

22 Q. What fantasy did you  
23 believe Ms. Robinson had?

24 A. The fantasy that she was  
25 painting for everyone all the time.

1 T. CHEN

2 She is always referencing the twins  
3 as the boys. And even arguing with  
4 when me -- after Bob and I would  
5 have a discussion about Christmas  
6 time and the children. It was the  
7 strangest thing ever. Bob and I  
8 would be talking about it, and then  
9 she would just come over and insert  
10 herself in a personal conversation  
11 that we are having about our family.  
12 It was very weird, in a way where  
13 she -- one of his sons even told me  
14 that he had to tell her, "You are  
15 not my fucking mom."

16 Q. Can you clarify what is the  
17 fantasy that you believe Ms.  
18 Robinson had?

19 A. I -- I don't know what  
20 fantasy she had. I know she is not  
21 stable. In a lot of ways I only  
22 feel really bad for her. I feel bad  
23 for her because you can tell that  
24 she wasn't happy the minute she met  
25 me. I had heard her voice on phone

1 T. CHEN  
2 calls before she met me, and it was  
3 always like -- even Bob would say,  
4 it is weird. She just keeps  
5 calling, and I told her I would call  
6 her when I have work to discuss with  
7 her, and she just keeps calling, and  
8 there is nothing to say, and she is  
9 just sort of trying to find what he  
10 is doing, where he is at. And there  
11 is nothing professional about the  
12 calls. So I don't know what her  
13 fantasy is, what she wanted. But I  
14 do know whatever she wanted, I was  
15 making it difficult for her to  
16 achieve her fantasy, it seemed more  
17 like this obsession of just wanting  
18 to be able to control Bob without  
19 any other influence. And to always  
20 throw around his name for her own  
21 vanity.

22 Q. Were you suspicious that  
23 Ms. Robinson wanted to be in a  
24 romantic relationship with Mr. De  
25 Niro?

1 T. CHEN

2 A. No. I know she really  
3 liked using that credit card.

4 Q. Ms. Robinson never told you  
5 that she wanted to be in a romantic  
6 relationship with Mr. De Niro,  
7 correct?

8 A. Of course not.

9 MR. DROGIN: So the  
10 record was clear, that was a  
11 negative?

12 THE WITNESS: Yes, that  
13 was the negative.

14 MR. DROGIN: I think it  
15 was a double negative.

16 THE WITNESS: Yes.

17 MR. DROGIN: Can you just  
18 read back the question and  
19 answer?

20 (Whereupon, the requested  
21 portion was read back by the  
22 reporter:

23 Q: Ms. Robinson never  
24 told you that she wanted to  
25 be in a romantic relationship

1 T. CHEN

2 with Mr. De Niro, correct?

3 A: Of course not.)

4 MS. MACMULLIN: We will  
5 move on now to a document  
6 that is Bates stamped Canal  
7 0048682 through 686.

8 (Whereupon, Plaintiff's  
9 Exhibit 80, Canal 0048682  
10 through 686, was marked for  
11 identification, as of this  
12 date.)

13 A. What was the number, from  
14 what to what again?

15 MS. MACMULLIN: It is  
16 0048682 through 686. We will  
17 mark this as Plaintiff's  
18 Exhibit 80.

19 MR. WARD: 4682?

20 MS. MACMULLIN: 48682.

21 THE WITNESS: 48682.

22 MR. WARD: Got it.

23 MS. LAZZARO: Counsel, it  
24 doesn't look like the one  
25 ending in Bates stamp 82 is

1 T. CHEN

2 in the Drop Box is shared.

3 Rather the 46683 document is

4 in the Drop Box.

5 MS. MACMULLIN: Why don't

6 we go off the record for a

7 second and we can check that?

8 THE VIDEOGRAPHER: The

9 time is now 12:03 p.m. and we

10 are off the record.

11 (Whereupon, a recess was

12 taken at this time.)

13 THE VIDEOGRAPHER: The

14 time is now 12:09 p.m. We

15 are back on the record.

16 Q. So Ms. Chen, looking at

17 what has been marked as Plaintiff's

18 Exhibit 80, this is a text

19 conversation between you and Mr. De

20 Niro?

21 A. Yes.

22 Q. Could you please turn to

23 page four of the document?

24 A. Yes. I am here.

25 MR. DROGIN: I didn't get

1 T. CHEN

2 the e-mail. Brittany is  
3 forwarding it to me. What is  
4 the number? 80?

5 MS. MACMULLIN: Yes. It  
6 is 80.

7 MR. DROGIN: Let her  
8 forward the e-mail to me.

9 MS. MACMULLIN: Okay.

10 MR. DROGIN: I just got  
11 it.

12 MS. MACMULLIN: Okay.

13 Q. Okay.

14 So Ms. Chen, give me one  
15 moment. Looking at about halfway  
16 through your text message at 6:08  
17 p.m.?

18 A. Uh-huh. Yes.

19 Q. You write, "I feel it is  
20 important to find out if our flight  
21 from Antigua was made good on for  
22 two reasons."

23 A. Where?

24 Q. If we are looking at your  
25 message, it is eight lines down?

1 T. CHEN

2 A. Okay.

3 Q. "I feel it is important to  
4 find out if our flight from Antigua  
5 was made good on for two reasons.  
6 One, just to make Chase follow up  
7 with you about what needs to get  
8 done in the future. And so she  
9 stops acting like the boss."

10 Do you see that?

11 A. Yes.

12 Q. From your perspective, was  
13 it inappropriate for Ms. Robinson to  
14 act like the boss?

15 A. How do you mean the boss?

16 Q. As you meant it when you  
17 used that word?

18 A. And what was your question  
19 again?

20 Q. From your perspective, was  
21 it inappropriate for Ms. Robinson to  
22 act like the boss?

23 A. In my home, yes. In my  
24 personal life, yes.

25 Q. And why did you think it

1 T. CHEN

2 was inappropriate?

3 A. Are you seriously asking me  
4 why I think it is inappropriate for  
5 my boyfriend's assistant to be  
6 inserting herself into my personal  
7 life? Because it is my personal  
8 life. And I did not hire her to be  
9 in my personal life. She was hired  
10 to behave professionally, which she  
11 completely lost all sight of.

12 Q. And then look at the bottom  
13 of that same text message, you  
14 write, "Her sense of entitlement  
15 stems from this imaginary intimacy  
16 she has with you. And I am seeing  
17 it in her texts about the house all  
18 over again. She thinks she's your  
19 wife."

20 A. Yes.

21 MR. DROGIN: For clarity,  
22 can you finish that sentence?

23 You stopped it mid sentence.

24 MS. MACMULLIN: Sure.

25 Q. "And I am tired of her

1 T. CHEN  
2 rearranging things and throwing my  
3 stuff on the floor whenever she  
4 decides she wants to be lady of the  
5 house. It is very bizarre and it  
6 really has to stop."

7 MR. DROGIN: Thank you.  
8 I would ask you that if you  
9 are going to read things into  
10 the record, I am not going to  
11 ask you to read that entire  
12 text message, but you at  
13 least have to finish the  
14 sentence. Okay? Is that  
15 fair?

16 MS. MACMULLIN: That is  
17 fair.

18 Q. Ms. Chen, what did you mean  
19 when you referred to "this imaginary  
20 intimacy she has with you?"

21 A. By arguing with me in my  
22 household when I want something a  
23 certain way or done a certain way,  
24 she steps in and starts trying to  
25 put her two cents in like she is the

1 T. CHEN

2 third person in the relationship.

3 And rolling her eyes at me and the

4 whole bit constantly. It is

5 ridiculous.

6 Q. What did you mean when you

7 wrote, "She thinks she is your

8 wife?"

9 A. Oh, because every time Bob

10 and I discussed something, she has

11 to always speak over me, as though

12 she is in my position, and she wants

13 to be there. That is what I mean.

14 Exactly what she is doing. She

15 keeps trying to overstep into my

16 position when she is just supposed

17 to be a professional, which she was

18 not.

19 Q. Did you believe that Ms.

20 Robinson wanted to be the lady of

21 the house?

22 MR. WARD: Objection to

23 the form. You can answer

24 that if you know what that

25 means.

1 T. CHEN

2 A. A lady she is not. But I  
3 know she wanted to take control of  
4 the house, which is what her  
5 behavior kept displaying. Any time  
6 Bob and I had a conversation about  
7 something, she would wait to hear  
8 what I would say to rebut it, and  
9 even become argumentive, rolling her  
10 eyes, and it was weird. Yeah. She  
11 wanted to be the head the household.  
12 A lady she is not. But she wanted  
13 to be in control.

14 Q. Did you believe Ms.  
15 Robinson wanted to be Mr. De Niro's  
16 wife?

17 A. Depends on how you would  
18 define wife. Please define that for  
19 me.

20 Q. Did you believe that Ms.  
21 Robinson wanted to be married to Mr.  
22 De Niro?

23 A. For what reasons?

24 Q. For any reasons?

25 A. Yes.

1 T. CHEN

2 Q. Did you believe that Ms.  
3 Robinson wanted to be a mother to  
4 Mr. De Niro's children?

5 A. She is not -- no. No. She  
6 is not mother material. And what I  
7 saw was not that she wanted to be a  
8 mother. She just wanted to control  
9 and do it in nasty ways.

10 Q. How convinced were you that  
11 Ms. Robinson had imaginary intimacy  
12 with Mr. De Niro?

13 A. What does that even mean?

14 MR. WARD: Objection to  
15 the form.

16 Q. It is your term from the  
17 text message, Ms. Chen.

18 A. Where?

19 Q. In your message at 6:08  
20 p.m., that last sentence, "Her sense  
21 of entitlement stems from this  
22 imaginary intimacy she has with  
23 you."

24 A. Yeah, like stepping over me  
25 to argue with me. And it was

1 T. CHEN  
2 strange, she would always -- if  
3 there was a birthday -- I remember  
4 the -- it was their interior  
5 designer's birthday, and I forgot  
6 how I had found out, but Bob was on  
7 the phone with Chase, and the  
8 birthday came up, and the first  
9 thing she wanted to do, she was like  
10 -- she said, "Oh. Should I get her  
11 something from us?" And Bob said,  
12 "No. Tiffany is getting her  
13 something from me and Tiffany." He  
14 even thought it was so weird how she  
15 phrased that. And also putting your  
16 yourself on as the security contact  
17 for my home is crazy. And a sign  
18 that she was always trying to  
19 posture to put herself in that  
20 position.

21 MS. MACMULLIN: We are  
22 going to move to a document  
23 that is Bates stamped Canal  
24 0048634 through 0048637.

25 MR. WARD: What is the

1 T. CHEN

2 exhibit number?

3 MS. MACMULLIN: First is

4 0048634.

5 MR. WARD: I'm sorry.

6 What exhibit is this?

7 MS. MACMULLIN: Oh,

8 Exhibit 81. Thank you.

9 MR. WARD: Thank you.

10 (Whereupon, Plaintiff's

11 Exhibit 81, Canal 0048634

12 through 0048637, was marked

13 for identification, as of

14 this date.)

15 Q. Ms. Chen, this is a text

16 conversation between you and Mr. De

17 Niro.

18 A. Uh-huh.

19 Q. If you turn to the bottom

20 of page three of this document, in

21 your text message at 8:31 p.m.?

22 A. Uh-huh.

23 Q. You twice referenced Ms.

24 Robinson's imaginary intimacy with

25 Mr. De Niro.

1 T. CHEN

2 A. Yes.

3 Q. What did you mean by that?

4 A. Well, when she e-mails Bob  
5 she is always referencing that she  
6 is in the middle. Nobody put her in  
7 the middle. She put herself in the  
8 middle, constantly. And I said it  
9 repeatedly. Every time Bob and I  
10 have a conversation or something we  
11 are trying to figure out in the  
12 house, she is inserting herself and  
13 she is not asked. We would even  
14 look at her like what you are doing.  
15 We are not talking to you. She is  
16 coming in, trimming down my trees,  
17 changing around my furniture. She  
18 has a distorted sense of what she  
19 thinks her intimacy with the whole  
20 situation is. She is constantly  
21 inserting herself, constantly trying  
22 to find a creepy way in.

23 Q. In the text message you  
24 also mentioned an odd desire to  
25 instigate her personal relationship

1 T. CHEN

2 with you.

3 A. Where is that?

4 Q. In the middle of the text  
5 message, third line going on to the  
6 fourth line?

7 A. Yeah, I was saying it to  
8 Bob.

9 Q. Right.  
10 What did you mean by that?

11 A. She is always pushing the  
12 envelope. Like she would call to  
13 FaceTime him about nothing. And he  
14 would always be trying to get off  
15 the phone. And if you look at her  
16 in the FaceTime, it would be so  
17 weird. She is holding it, and  
18 posing, and looking at him like  
19 smiling and giggling. It is so  
20 weird and creepy. This is the weird  
21 stuff she always did. She would  
22 call him when she would take her  
23 trips with her friends, and tell  
24 him, "Oh, I just wanted to FaceTime  
25 you and show where I'm at. And we

1 T. CHEN  
2 definitely have to come back here  
3 sometime." We this and we that.  
4 And Bob would be so uncomfortable on  
5 the phone, and he would finally get  
6 off and he would just say, "She is  
7 getting a little weird. It is like  
8 I don't understand what she wants.  
9 I don't know if she has any friends  
10 or she is really lonely." And then  
11 when we would talk about it, we  
12 would just like feel really bad for  
13 her. Because a lot of the things  
14 she did were always like pathetic  
15 cries for attention. And you  
16 realized at the end of the day she  
17 must be very alone, and just bored  
18 to constantly meddle in our lives  
19 and not leave us alone in our  
20 personal life. I mean, it is just  
21 sad when you see something like  
22 that.

23 MR. DROGIN: Can you  
24 describe for the record the  
25 gesture that the witness was

1 T. CHEN

2 making?

3 THE WITNESS: I'm sorry.

4 What?

5 MR. DROGIN: I asked Kate  
6 to describe for the record  
7 the gesture that you were  
8 making.

9 MS. MACMULLIN: I could  
10 not, but we have a video  
11 record of it.

12 MR. DROGIN: Right.  
13 There is also a paper record.  
14 So I'll do it. So the  
15 witness was holding her hand  
16 up above her head, at an  
17 angle, looking into the  
18 telephone as opposed to  
19 straight on in a really  
20 creepy way. You can either  
21 adopt my characterization, or  
22 if you think I  
23 mischaracterized it, please  
24 feel free to go ahead.

25 MS. MACMULLIN: Counsel,

1 T. CHEN

2 the commentary is  
3 inappropriate.

4 MR. DROGIN: I think it  
5 is inappropriate to not  
6 describe for the paper record  
7 what is happening. Since the  
8 likelihood is that this paper  
9 record is shown to the Court  
10 in the motion, not the video.

11 Q. Ms. Chen, were you  
12 concerned that Ms. Robinson was  
13 trying to instigate a romantic  
14 relationship with Mr. De Niro?

15 A. I don't understand what her  
16 definition of romantic would be.  
17 She is weird.

18 Q. Were you concerned that Ms.  
19 Robinson was trying to become  
20 romantically involved with Mr. De  
21 Niro?

22 A. I don't understand what --

23 MR. WARD: Objection.

24 Asked and answered. But she  
25 will answer it again.

1 T. CHEN

2 A. I don't understand what she  
3 thinks romantic is. She is creepy  
4 and a weirdo. She is all of the --  
5 the stuff you are showing me. She  
6 is not stable.

7 Q. I am asking about your  
8 concerns, Ms. Chen.

9 So were you concerned that  
10 Ms. Robinson wanted to instigate a  
11 romantic relationship with Mr. De  
12 Niro?

13 A. No. Not by my definition  
14 of romantic. I don't know what hers  
15 is.

16 Q. What is your definition of  
17 romantic?

18 A. Two people meet, connect,  
19 and it happens naturally. It can't  
20 be orchestrated. That is my  
21 definition of romantic. It is  
22 honest. She is not honest.

23 Q. If we turn to the next page  
24 in this document, your message at  
25 8:31 p.m., you wrote, "Well, I think

1 T. CHEN

2 she has assets. She needs to be  
3 called out to her face and set  
4 straight. She wants to act like a  
5 victim. She is not."

6 What did you believe Ms.  
7 Robinson's assets were?

8 A. From my experience, sadly,  
9 I did not see any redeeming  
10 qualities, which made me feel bad  
11 for her. And also made me feel as  
12 though she had short circuited so  
13 badly after having met me, maybe she  
14 was just -- you know, that is what  
15 was the catalyst for it. But I --  
16 the only asset she has is when she  
17 goes away. But then she always came  
18 back. I never got to see any of  
19 that. I heard that she had done  
20 good work at the office, but then  
21 she did not want to work at the  
22 office. She wanted to be at the  
23 townhouse all the time. I mean, I  
24 don't find -- yeah. I -- the only  
25 assets were the things that I had

1 T. CHEN

2 been told, but never experienced.

3 Q. At a certain point you got  
4 the impression that Ms. Robinson had  
5 a crush on Mr. De Niro, is that  
6 correct?

7 A. How do you define crush?

8 Q. You got the impression that  
9 Ms. Robinson had romantic feelings  
10 for Mr. De Niro, is that correct?

11 MR. WARD: Objection. Go  
12 ahead. You can answer.

13 A. No. No. Like I said, you  
14 keep bringing romance up and  
15 romantic. I don't think she is a  
16 romantic person because I think  
17 romance comes from a very honest  
18 place. She is not honest. That is  
19 why we are here.

20 Q. Did Mr. De Niro ever  
21 express a belief that Ms. Robinson  
22 had a crush on him?

23 A. No. He always said that  
24 she was just weird and complaining  
25 all the time, and complaining about

1 T. CHEN  
2 everybody and getting hysterical,  
3 and screaming at people, which she  
4 always did at the townhouse. It was  
5 not a behavior that I find  
6 acceptable at all, and that I would  
7 allow my staff to be abused by.

8 MS. MACMULLIN: We are  
9 going to move to the next  
10 document which is Bates  
11 stamped Canal 0047380 through  
12 384.

13 MR. WARD: Can you say  
14 that again, please?

15 MS. MACMULLIN: Canal  
16 0047380 through 0047384.

17 (Whereupon, Plaintiff's  
18 Exhibit 82, Canal 0047380  
19 through 0047384, was marked  
20 for identification, as of  
21 this date.)

22 MR. WARD: 82?

23 MS. MACMULLIN: 82.

24 Thank you.

25 Q. So Ms. Chen, this is a text

1 T. CHEN

2 conversation between yourself and  
3 Michael Kaplan.

4 A. Uh-huh.

5 Q. Turning to the second page  
6 of the document, your message at  
7 9:36 a.m., halfway through the page,  
8 you write, "Also said she made it  
9 very obvious to everyone that she  
10 thought she was moving in here."

11 A. Uh-huh.

12 Q. Does that refer to Ms.  
13 Robinson?

14 A. Yes.

15 Q. And when did you form the  
16 impression that Ms. Robinson wanted  
17 to move into Mr. De Niro's rental  
18 home?

19 A. Well, the minute I met her.  
20 And she is grabbing her temple and  
21 steaming with anger. And every  
22 other time I seen her was the same  
23 kind of psychosis. And then one of  
24 Bob's drivers had said that she was  
25 one hundred percent planning on

1 T. CHEN  
2 moving in, but everybody says that  
3 she is absolutely crazy, and mean  
4 and abusive to everybody. So it  
5 wasn't -- it wasn't weird that she  
6 would think something so far and  
7 away because she just had a  
8 reputation.

9 Q. Did Mr. De Niro ever  
10 express a belief that Ms. Robinson  
11 wanted to move into the townhouse?

12 A. No, no. Not at all.

13 MS. MACMULLIN: We are  
14 moving to the next document  
15 which is Bates stamped Canal  
16 0047380 through 384.

17 A. 380 to 384?

18 MR. DROGIN: Isn't that  
19 the one we just marked?

20 MR. WARD: That is what  
21 you just marked.

22 MS. MACMULLIN: So this  
23 is still Plaintiff's Exhibit  
24 82.

25 A. We are on the same thing

1 T. CHEN

2 still?

3 Q. Yes, we are.

4 MS. HARWIN: We are just  
5 going to move to -- hold on.  
6 I lost my place, but I think  
7 this is actually a good place  
8 to maybe take a lunch break  
9 and I can pick it back up  
10 after then.

11 Q. Ms. Chen, how long would  
12 you like for lunch?

13 A. I would rather just get  
14 this stuff done. I don't need a  
15 long -- I don't need long.

16 MS. MACMULLIN: So maybe  
17 we can come back at 1:00  
18 p.m.?

19 MR. HARVEY: We are going  
20 to be here all night then.  
21 We are going to be here all  
22 night. It's 12:30. Why are  
23 we wasting another half hour?  
24 We already wasted two hours.

25 MS. MACMULLIN: I think

1 T. CHEN

2 if 1:00 p.m. works for the  
3 witness that works for us and  
4 we will be back at 1:00.

5 A. Actually, I prefer to just  
6 keep pushing through. I don't need  
7 a break.

8 MS. MACMULLIN: I would  
9 like to take a break until  
10 1:00 p.m. So let's please go  
11 off the record.

12 THE VIDEOGRAPHER: The  
13 time is 12:32 p.m. and we are  
14 going off the record.

15 (Whereupon, a recess was  
16 taken at this time.)

17 THE VIDEOGRAPHER: The  
18 time is now 1:01 p.m., And we  
19 are back on the record.

20 MS. MACMULLIN: We are  
21 going to go back to the  
22 exhibit we were looking at  
23 before break, which is  
24 Plaintiff's Exhibit 82, Bates  
25 stamped Canal 0047380 through

1 T. CHEN

2 384.

3 Q. If you could just turn to  
4 page four of that document?

5 A. Yes.

6 Q. Looking at the bottom of  
7 the page, at your message at 1:13  
8 p.m. Do you see where --

9 A. 1:13.

10 Q. Yes.

11 MR. DROGIN: Can you give  
12 us a page number?

13 MS. MACMULLIN: My  
14 apologies.

15 A. It is the third page.

16 Q. Yes.

17 The third page, your  
18 message at 1:13 p.m., which says,  
19 "The whole situation has --

20 MR. DROGIN: Can you  
21 identify the document again?

22 MS. MACMULLIN: Yes. It  
23 is Canal 0047380 through  
24 0047384 and we are on page  
25 0047382.

1 T. CHEN

2 MR. DROGIN: Got it. Go  
3 ahead. Thank you.

4 Q. Ms. Chen, your message at  
5 1:13 p.m.?

6 A. Yes.

7 Q. The last line reads, "The  
8 whole situation has become very  
9 single white female."

10 Do you see that?

11 A. Yes, I do.

12 Q. When you referred to "the  
13 whole situation," you were referring  
14 to the situation with Ms. Robinson,  
15 is that correct?

16 A. Yes.

17 Q. And when you referred to  
18 the situation with Ms. Robinson as  
19 "very single white female," what did  
20 you mean?

21 A. That she was -- I was  
22 quoting a movie, where she was  
23 literally trying to step into my  
24 life in all kinds of inappropriate  
25 ways, which have gotten aggressive

1 T. CHEN

2 and just nasty.

3 Q. Ms. Chen, had you ever  
4 referred to Ms. Robinson as, quote,  
5 "Such a white girl?"

6 A. No.

7 MS. MACMULLIN: We are  
8 now going to move on to a  
9 document that is Bates  
10 stamped Canal 0048617 through  
11 0048619, which we will mark  
12 as Plaintiff's Exhibit 83.

13 (Whereupon, Plaintiff's  
14 Exhibit 83, Canal 0048617  
15 through 0048619, was marked  
16 for identification, as of  
17 this date.)

18 A. What were the numbers  
19 again?

20 Q. Mr. Chen, this is a text  
21 conversation between you and Mr. De  
22 Niro?

23 A. Uh-huh.

24 Q. If you look at page two of  
25 the document?

1 T. CHEN

2 A. Uh-huh. Yes.

3 Q. If you look at the first  
4 text message from 1:53 a.m., you  
5 write, "I was thinking about Chase's  
6 e-mail. She says she is just trying  
7 to do her job. Nobody is stopping  
8 her but herself."

9 A. Yes.

10 Q. What did you understand Ms.  
11 Robinson's job to be?

12 A. Bob's assistant.

13 Q. And what was the scope of  
14 Ms. Robinson's job responsibilities  
15 as Mr. De Niro's assistant?

16 A. I can't answer that  
17 question. She is Mr. De Niro's  
18 assistant, not mine.

19 Q. What did you understand the  
20 scope of Ms. Robinson's job  
21 responsibilities to be as Mr. De  
22 Niro's assistant?

23 A. To act in the role of his  
24 assistant.

25 Q. Ms. Chen, what did you

1 T. CHEN

2 understand Ms. Robinson's job  
3 responsibilities to be as Mr. De  
4 Niro's assistant?

5 A. Whatever he asked her to do  
6 in the office, and whatever job she  
7 was assigned to, which was the  
8 townhouse, which she stepped into  
9 very willingly and would not go  
10 away.

11 Q. Turning to your message on  
12 this page at 2:09 p.m., do you see  
13 where you write, "If you keep her.  
14 You and I will eventually have  
15 problems?"

16 A. Yes.

17 Q. What did you mean by that?

18 A. That she -- if she was --  
19 if she would stick around at the  
20 townhouse, and not get set straight  
21 for all the inappropriate things  
22 that she had done, that Bob and I  
23 would end up having problems because  
24 all she does is make problems when  
25 she is around. She is very sneaky,

1 T. CHEN  
2 very nasty, just very mean, very  
3 passive aggressive. She would mess  
4 with my things when she was the last  
5 person at the house before I was  
6 getting there. She would be  
7 instructed not to do certain things,  
8 like for Marty's birthday parties, I  
9 had spoken to Bob. I said, "It is  
10 better that she takes direction from  
11 you. Not from me. Because she is  
12 your assistant, and I could  
13 understand how that could bother her  
14 to take direction from me."

15 So we went over a list of  
16 things. And we said don't buy  
17 napkin rings. It is just a waste.  
18 And she turned to me and say, "Yeah.  
19 Bob told me to not to get napkin  
20 rings, but I do what I want." So  
21 that was not professional.

22 Q. Looking at your text  
23 message from 2:33 a.m.?

24 A. Uh-huh.

25 Q. On the third line, you

1 T. CHEN

2 write, "I will wait to see what you  
3 do, but keeping her around is just a  
4 slap in my face after how she felt  
5 entitled to act towards me today?"

6 A. Yes.

7 Q. What action did you believe  
8 Mr. De Niro should take with respect  
9 to Ms. Robinson's employment?

10 MR. WARD: Objection to  
11 the form. You can answer.

12 A. I don't understand the --  
13 the question. Could you say it  
14 again?

15 Q. Sure.

16 Where you wrote, "I will  
17 wait to see what you do," what  
18 action did you believe Mr. De Niro  
19 should take with respect to Ms.  
20 Robinson's employment?

21 MR. WARD: I'm going to  
22 object to that because there  
23 is nothing in here about  
24 employment. I would ask that  
25 you rephrase it.

1 T. CHEN

2 Q. As of March 28, 2019, what  
3 actions did you believe that Mr. De  
4 Niro should take with respect to Ms.  
5 Robinson's employment?

6 A. Confront her about all the  
7 stealing, and all the lying that she  
8 had been doing. Confront about the  
9 work that she had not done at the  
10 townhouse and was being very phony  
11 about. Confront her about being  
12 disrespectful to other staff.  
13 Confront her about being  
14 disrespectful to me. Confront her  
15 about being disrespectful him. She  
16 would yell and curse at him in front  
17 of me, and it made me furious that  
18 it was happening in my house. But I  
19 never stepped in because that was  
20 his assistant and not my place to  
21 step in, but it was wearing thin.

22 Q. Did you speak with Mr. De  
23 Niro about wanting him to terminate  
24 Ms. Robinson's employment?

25 A. Never. People make

1 T. CHEN  
2 mistakes. You know, she was  
3 obviously -- she is not right in the  
4 head. She was completely crazy and  
5 obsessed. She couldn't see  
6 straight. If she had done her job  
7 well before I was there, I was  
8 hoping to try to give her a chance  
9 to get her head back on, but it just  
10 got looser. I tried very hard to  
11 give her as many chances as  
12 possible.

13 MS. MACMULLIN: We are  
14 going to move to the next  
15 document, which is Bates  
16 stamped Canal 0009191, and I  
17 will mark this as Plaintiff's  
18 Exhibit 84.

19 MR. WARD: I'm sorry.  
20 Number again, please?

21 MS. MACMULLIN: It is  
22 Canal 0009191 and it actually  
23 goes to 9193.

24 A. Goes to where?

25 MR. WARD: 9193.

1 T. CHEN

2 (Whereupon, Plaintiff's  
3 Exhibit 84, 0009191, was  
4 marked for identification, as  
5 of this date.)

6 Q. Ms. Chen, do you have the  
7 document in front of you?

8 A. I do.

9 Q. You wrote, "Maybe you  
10 should make a new guide for both Bob  
11 and myself, this way he and I know  
12 what you have determined your  
13 responsibilities to be."

14 What prompted you to write  
15 this?

16 A. Well, after telling me that  
17 Bob told her not to get napkin  
18 rings, but she doesn't care, she  
19 does what she wants to do, I started  
20 to realize that this is a pattern of  
21 behavior. So any time you ask her  
22 to do something, she loves to be  
23 difficult. And either she won't  
24 give you the information, or it is  
25 so weird she'll just talk like

1 T. CHEN  
2 really, really fast. You won't even  
3 know what she is saying. She will  
4 ramble, "I am so busy," and then she  
5 walks away. You never get anything  
6 straight from her. But every time I  
7 started to ask her to get anything  
8 done, or Bob would ask me to check  
9 in with her, she never had a  
10 straight answer for anything, or it  
11 was like, that is my responsibility,  
12 I am not in touch with him. Which  
13 was crazy because she was at the  
14 townhouse all the time. She was  
15 good friends with a guy from 4th.  
16 She loved telling you about how  
17 familiar she is with people that  
18 have known Bob for so long. So in  
19 this instance, it was so exhausting  
20 and such a waste of time to ask her  
21 for information about things that  
22 she was voluntarily doing, and  
23 putting -- her positioning herself  
24 in unwanted, where I said, "Then  
25 just make a guide for yourself."

1 T. CHEN

2 Because this is boring going back  
3 and forth, back and forth. I don't  
4 do this, contact this. It was just  
5 this silly little high school game  
6 that was going on.

7 Q. Looking at this e-mail  
8 exchange, there were paintings that  
9 needed to be removed from the walls  
10 at the home you shared with Mr. De  
11 Niro, correct?

12 A. Yes. Yes.

13 Q. And you were frustrated  
14 that Ms. Robinson was not handling  
15 that issue, correct?

16 A. Yes.

17 Q. You understood this to be  
18 something that Ms. Robinson should  
19 handle, correct?

20 A. She put up the paintings.  
21 She stepped over me every time I was  
22 positioning the paintings in the  
23 house. She was fully aware and  
24 fully involved all the time with the  
25 paintings. It was something she

1 T. CHEN

2 handled, and when Bob wanted me to  
3 take care of it when they were  
4 putting the paintings in, she pushed  
5 me out. I stepped back because I  
6 realized she was acting crazy and  
7 you just don't engage with a crazy  
8 person when you need to get stuff  
9 done. And I didn't mind where she  
10 placed the paintings so I let her do  
11 it that time. I did speak to Bob  
12 about her behavior and everything  
13 just kept adding up.

14 Q. So you understood this to  
15 be something that Ms. Robinson  
16 should handle, correct?

17 A. I believe this is something  
18 that she took on herself to handle  
19 and demonstrated that she was in  
20 control of it, and in charge of it.  
21 Until I needed a change, then she  
22 changed her mind.

23 Q. Looking back at the  
24 document about five lines down, you  
25 wrote, "Kap has kids and now a

1 T. CHEN

2 health issue so that comes first and  
3 foremost."

4 A. Yes.

5 Q. Can you explain how Michael  
6 Kaplan having kids impacted his job  
7 responsibilities?

8 A. It didn't.

9 Q. So why did you reference  
10 Michael Kaplan having kids in this  
11 e-mail?

12 A. I was referencing his

13 [REDACTED]  
14 he was on vacation. He had just  
15 come back and his first day back  
16 Chase was screaming and cursing at  
17 him. And trying to put all  
18 responsibilities on him. He had a  
19 [REDACTED]  
20 two young children. He had just  
21 gotten back home. He wasn't even at  
22 home. He was in Vermont. The  
23 concern was that Kap just recovered  
24 [REDACTED]  
25 be screamed at, or cursed at, or

1 T. CHEN  
2 pushed around. He had to spend time  
3 with his family and children while  
4 he was recovering. It is called  
5 being compassionate, and Chase was  
6 very abusive to him. That was the  
7 one thing that really really really  
8 struck me. I was so sickened at how  
9 she would curse at somebody and  
10 scream at them their first day back  
11 after almost dying.

12 MS. MACMULLIN: We are  
13 going to move to the next  
14 document, which is Bates  
15 stamp Canal 0046683, which we  
16 will mark as Plaintiff's  
17 Exhibit 85.

18 (Whereupon, Plaintiff's  
19 Exhibit 85, Canal 0046683  
20 through 684, was marked for  
21 identification, as of this  
22 date.)

23 MS. MACMULLIN: It goes  
24 through 684.

25 MR. WARD: It goes from

1 T. CHEN

2 46683?

3 MS. MACMULLIN: To 46684.

4 A. Okay.

5 Q. So Ms. Chen, looking at Ms.  
6 Robinson's e-mail to Mr. De Niro?

7 A. Uh-huh.

8 Q. In the third paragraph, she  
9 writes, "I am worried that my  
10 presence in the house amongst other  
11 things is not working for Tiffany.  
12 And, therefore you -- I felt this  
13 way since September/November."

14 Did you agree that Ms.  
15 Robinson's presence in your home  
16 with Mr. De Niro was not working for  
17 you?

18 A. Ask me that again one more  
19 time? Sorry.

20 Q. No problem. Did you agree  
21 that Ms. Robinson's presence in your  
22 home with Mr. De Niro was not  
23 working for you?

24 A. I wouldn't put it that way  
25 at all. Like I said, we felt bad

1 T. CHEN  
2 for her. And she was very very  
3 difficult. She wasn't doing her  
4 work. So that was difficult when  
5 you have somebody in your house not  
6 doing their work, but screaming at  
7 everybody, and your boyfriend who  
8 you live with, who is your boss.  
9 Her attitude of not doing her job  
10 bothered me, but we were trying to  
11 find a way to just get her out of  
12 the townhouse and put her in the  
13 office. But then I also didn't want  
14 to hurt her feelings too much by  
15 just taking her out of the townhouse  
16 because she seemed like really  
17 weirdly attached to it. I was  
18 trying to find a way to just have  
19 Bob do more of the communicating  
20 between the two of us. It is a  
21 complicated situation when somebody  
22 is not focused on their job.

23 Q. What aspects on Ms.  
24 Robinson's job did you believe she  
25 was not doing?

1 T. CHEN

2 A. Everything. She was  
3 dishonest. She was abusive. She  
4 was abusive to staff. She was  
5 abusive to me. She was abusive to  
6 her boss. You can never get a  
7 straight answer from her. She never  
8 -- she never gave an honest expense  
9 report for the petty cash that she  
10 was blowing through. She is not  
11 honest. You ask her not to do  
12 something, like I said, the birthday  
13 party for Marty. She volunteered to  
14 go get things. We told her, through  
15 Bob, "Don't get napkin rings." She  
16 said, "Bob told me not to, but I  
17 don't care I do what I want." It is  
18 hard to work with an employee that  
19 is like that.

20 Q. When did Ms. Robinson make  
21 the comment that you just referenced  
22 to allegedly about napkin rings?

23 A. It was in the first piece  
24 that we sat down and looked at when  
25 we came back from lunch. The piece

1 T. CHEN  
2 that you forgot that was in front of  
3 us that we were looking at and  
4 called us to put in front of us and  
5 then someone reminded you that was  
6 the document that was already in  
7 front of us.

8 Q. So that would have been  
9 Exhibit 82, which was April 1, 2019?

10 A. I don't think so because  
11 that is not when Marty's birthday  
12 is.

13 Q. When is Marty's birthday?

14 A. It is not in April because  
15 that is when my birthday is. I  
16 can't remember offhand. We would  
17 have done a birthday together if  
18 that was the case.

19 Q. So do you know the  
20 approximate date of the comment  
21 about napkin rings?

22 A. Well, it is in your  
23 documents. I can't recall a date  
24 from years ago. If I did, that  
25 would -- I would be a genius.

1 T. CHEN

2 Q. Okay.

3 MR. DROGIN: Wikipedia  
4 says November 17th if that  
5 helps you orient back to a  
6 document.

7 MS. MACMULLIN: Sorry.  
8 Mr. Drogin, I couldn't hear  
9 you.

10 MR. DROGIN: Wikipedia  
11 says November 17th if that  
12 helps you orient back to a  
13 document.

14 MS. MACMULLIN: Okay.  
15 Thank you.

16 MR. DROGIN: You are  
17 welcome.

18 Q. Ms. Chen, were there any  
19 witnesses to the comment about the  
20 napkin rings?

21 A. I can't remember.

22 Q. Were there any job duties  
23 that you believe Ms. Robinson should  
24 be doing that she was not doing?

25 A. Yes.

1 T. CHEN

2 Q. And what were those job  
3 duties?

4 A. Her job. Her actual job,  
5 which was to be respectful to her  
6 boss and execute what her boss  
7 asked. To be respectful to her  
8 coworkers, which she was not.

9 Q. Ms. Chen, turning back to  
10 the document that you have in front  
11 of you?

12 A. Uh-huh.

13 Q. In the fourth paragraph of  
14 Ms. Robinson's e-mail to Mr. De  
15 Niro, she mentions a solution where  
16 she could be based outside of New  
17 York.

18 Was that something that  
19 concerned you?

20 A. No.

21 Q. And then -- go ahead.

22 A. No. I -- go ahead. And  
23 look where?

24 Q. Looking at your response to  
25 this e-mail, you wrote, "She is a

1 T. CHEN

2 real piece of work."

3 What prompted you to write  
4 that?

5 A. This whole e-mail is  
6 ridiculous. It is silly high school  
7 games of poor me, poor me, I am  
8 worried. But she is not worried  
9 about anything. She is nasty to  
10 everybody all the time. How does  
11 she even expect anyone to have a  
12 nice relationship with her when she  
13 is nasty to begin with? She curses  
14 at everybody. She is screaming.  
15 She is barking orders. She creates  
16 such a hostile environment. And  
17 this e-mail is a joke. All she ever  
18 was trying to do when she worked for  
19 Bob was to travel and go other  
20 places. And this is just her trying  
21 to orchestrate her con on everybody.  
22 There was nothing -- it is like  
23 poor, me poor me, poor me. She is  
24 the one that victimized everybody.  
25 And it is so disappointing to see

1 T. CHEN  
2 poor, me poor me, poor me. But the  
3 other thing I also see in this is  
4 she is very mentally unstable and  
5 not well because this is not rooted  
6 in reality. It is pathetic.

7 MS. MACMULLIN: We are  
8 going to the next document,  
9 which is Bates stamped Canal  
10 0034641 through 642, and I  
11 will mark this as Plaintiff's  
12 Exhibit 86.

13 (Whereupon, Plaintiff's  
14 Exhibit 86, 0034641 through  
15 642, was marked for  
16 identification, as of this  
17 date.)

18 A. What were the numbers  
19 again?

20 Q. It is 0034641 through 642.  
21 Do you have the document in  
22 front of you, Ms. Chen?

23 A. Yes, I do.

24 Q. Okay. Great.

25 Looking at your e-mail, you

1 T. CHEN

2 wrote, "This shit really pisses me  
3 off. That is too manipulative that  
4 she has the goal to place blame on  
5 me for her lies. This bitch needs  
6 to get put in her fucking place."

7 A. Yes.

8 Q. What did Ms. Robinson write  
9 that pissed you off?

10 A. Oh, it is whole pathetic  
11 mind game she is playing with these  
12 e-mails. Playing she is the victim.  
13 She is not worried. She is the one  
14 making the problems. I have said it  
15 again and again. She screams at  
16 everybody. She is disrespectful.  
17 She is so off the rail sometimes it  
18 is like you don't -- you can't help  
19 but feel sorry for her, and just  
20 feel like this is crazy.

21 Q. And when you wrote, "This  
22 bitch needs to get put in her  
23 fucking place," what did you believe  
24 should happen to Ms. Robinson?

25 A. She needed to get called

1 T. CHEN

2 out for all of her stealing, all of  
3 her lies, messing with the place,  
4 messing with my things when I am not  
5 there because she was angry about  
6 the situation. She had to be put in  
7 her place. She had to get called  
8 out. She had to get called out for  
9 how much she was abusing everybody.  
10 Most of all, how much she was  
11 abusing her own boss.

12 Q. Did you communicate those  
13 sentiments to Mr. De Niro?

14 A. Yeah.

15 Q. And what was Mr. De Niro  
16 planning to do to put Ms. Robinson  
17 in her place?

18 MR. WARD: Objection.

19 You can answer.

20 A. We were going to have a  
21 meeting together. And then we were  
22 going to have the two other  
23 assistants in the office come to the  
24 meeting to sit with Chase and  
25 confront her about all of the lies.

1 T. CHEN

2 All of the lies, all of the  
3 stealing, and all of the nastiness  
4 that she had doled out for several  
5 years on people. And to see if  
6 there was a way that we could -- if  
7 there was something going on we  
8 didn't understand, we could try and  
9 find her help. And in the instance  
10 if she didn't want to accept help  
11 than maybe we could try to work with  
12 her to get her to a comfortable  
13 place, where she could just settle  
14 in the office again, but understand  
15 that we know that she is taking  
16 things without permission and that  
17 is not right. And with the  
18 understanding that we know that she  
19 is abusive to people, and speaking  
20 terribly to them because she has  
21 done it in front of us and that she  
22 has to stop that behavior and make  
23 improvements. That was what the  
24 talk was going to be about.

25 Q. And when you just referred

1 T. CHEN

2 to Ms. Robinson's lies, what are you  
3 referring to?

4 A. I am referring to  
5 everything. When -- whenever you  
6 ask for information, she is always  
7 giving you something else other than  
8 what you are asking for, or she is  
9 too busy, and then she just never  
10 answers you. The petty cash she was  
11 stealing, Bob's AMEX points that she  
12 was stealing. I found out a place  
13 that we frequent for Christmas  
14 presents, she was having the store  
15 put her personal Christmas presents  
16 on Bob's credit card. And also  
17 having them write out the cards that  
18 were from her to whomever. And they  
19 would say, "This should go on Mr. De  
20 Niro's credit card?" And she would  
21 say, "Yes." And we found out about  
22 it. We were going to confront her  
23 about everything. Those lies.

24 There is one more thing,  
25 when I was coming back from Antigua

1 T. CHEN

2 we didn't have any catering on the  
3 plane, and I questioned the pilot  
4 thoroughly. He said it was  
5 requested from the office that there  
6 be no catering on that flight.  
7 Another lie that she said she never  
8 said. When I questioned the people  
9 there, they said it was her. They  
10 said it was very weird. Mr. De Niro  
11 always wants catering on the  
12 flights. All the lies constantly.

13 MS. MACMULLIN: We are  
14 going to move to the next  
15 document, which is Bates  
16 stamped Canal 0047432 through  
17 007436. I will mark this as  
18 Plaintiff's Exhibit 87.

19 (Whereupon, Plaintiff's  
20 Exhibit 87, Canal 0047432  
21 through 007436, was marked  
22 for identification, as of  
23 this date.)

24 MS. MACMULLIN: Let's  
25 take a five-minute break. We

1 T. CHEN

2 can go off the record.

3 THE VIDEOGRAPHER: The  
4 time is now 1:30 p.m. We are  
5 off the record.

6 (Whereupon, a recess was  
7 taken at this time.)

8 THE VIDEOGRAPHER: The  
9 time is now 1:36 p.m. We are  
10 back on the record.

11 Q. Ms. Chen, looking at the  
12 document from before the break,  
13 which is marked as Plaintiff's  
14 Exhibit 87, if you could just turn  
15 to page two of the document?

16 A. Yes.

17 Q. At 8:31 p.m., you wrote,  
18 "He is pissed about that e-mail she  
19 sent. Really pissed."

20 Were you referring to Mr.  
21 De Niro?

22 A. Yes. Yes.

23 Q. And is the e-mail that you  
24 are referring to the one that we  
25 were just looking at that was marked

1 T. CHEN

2 as Plaintiff's Exhibit 86 from April  
3 2, 2019?

4 A. I'm not sure if it was that  
5 one, or, you know -- she sends weird  
6 e-mails regularly.

7 Q. What did Mr. De Niro say or  
8 do to convey that he was pissed at  
9 Ms. Robinson?

10 A. I don't remember any exact  
11 words, but we were both annoyed  
12 because everything was -- one, she  
13 is not doing her job anywhere. She  
14 is not doing her job at the  
15 townhouse. She is not doing her job  
16 at the office. And all she does is  
17 make problems, and give false  
18 information, and mess with my  
19 schedule all the time. So it was  
20 something that we had always had  
21 discussed which was frustrating, and  
22 annoying, and ridiculous. And the  
23 minute she started playing the  
24 victim role when she is the one  
25 hurting everyone else. It was the

1 T. CHEN

2 ongoing topic of discussion from the  
3 moment of meeting Chase. And just  
4 how we could -- actually, do right  
5 by her somehow, and try to figure it  
6 out, out of compassion. But then  
7 you realize you can't help anybody  
8 that didn't want to help herself.  
9 She wanted to help herself to his  
10 life and to his things.

11 Q. In your next message where  
12 you wrote, "He is going to have her  
13 come over so I can set her  
14 straight," what were you planning to  
15 do to set Ms. Robinson straight?

16 A. What I told you before.  
17 List all of the things she has done  
18 wrong, ask her about all the things  
19 that were missing, ask her to  
20 provide lists for all of the petty  
21 cash she is asking for. Ask her  
22 about miles that she had taken  
23 without permission of points, and  
24 just see where we go from here.

25 Q. If you turn to the next

1 T. CHEN

2 page of the document, you wrote at  
3 8:53 p.m., "There are going --

4 A. One minute.

5 Q. Take your mine.

6 A. Okay. Yeah.

7 Q. "There are going to be a  
8 lot of changes."

9 What changes to Ms.  
10 Robinson' job responsibilities were  
11 going to occur?

12 A. I never said that.

13 Q. So what changes were you  
14 referring to?

15 A. In general, there is going  
16 to be a lot of changes. She was one  
17 of them, but in general.

18 Q. What changes were going to  
19 occur with respect to Ms. Robinson?

20 A. She was going to be told  
21 that we know that she is lying and  
22 stealing, and we are sick of her  
23 yelling at everybody and cursing at  
24 everyone, because that can also  
25 create problems for Bob that she is

1 T. CHEN

2 unprofessional and abusive. It is  
3 like all of it was-- people were  
4 coming to me to tell me everything  
5 about her. And I am like, we are  
6 going to have lawsuits of people  
7 wanting to sue because of her  
8 behavior and her mistreatment of  
9 everyone. We have to handle this  
10 now. It is too much drama going on,  
11 and I could sense she is just making  
12 more and more drama. She is driven  
13 that way. It is very evil.

14 Q. Looking at your message at  
15 10:01 p.m., the last line of your  
16 message, you write, "Then he is  
17 going to phase her out. But she  
18 is" --

19 A. 1001. Sorry. Yes.

20 Q. Okay.

21 "Then he is going to phase  
22 her out, but she is going to have to  
23 teach her replacement."

24 A. Yes.

25 Q. Was it Mr. De Niro's plan

1 T. CHEN

2 to phase out Ms. Robinson?

3 A. She was phasing herself  
4 out. She agreed to a two-year  
5 agreement with him. So if you have  
6 a set agreement that you are just  
7 going to be here for two more years,  
8 you have to start planning for the  
9 replacement. And it takes a lot of  
10 time to train a person to do all the  
11 stuff that Chase claims she did, but  
12 never did, and push off to other  
13 people and took credit for her work  
14 while she abused them. Phase out  
15 was something she was doing to  
16 herself with Bob.

17 Q. Okay.

18 MS. MACMULLIN: We are  
19 going to move to the next  
20 document, which is Bates  
21 stamped Canal 0047503 through  
22 509, and we will mark this as  
23 Plaintiff's Exhibit 88.

24 MR. WARD: One more time?

25 MS. MACMULLIN: Canal

1 T. CHEN

2 0047503 through 509.

3 (Whereupon, Plaintiff's  
4 Exhibit 88, Canal 0047503  
5 through 509, was marked for  
6 identification, as of this  
7 date.)

8 Q. So Ms. Chen, looking at  
9 page five of the document, in your  
10 message at 5:37 p.m., let me know  
11 when you are there?

12 A. Yes.

13 Q. You wrote, "I am going to  
14 fucking give this bitch what she  
15 deserves face to face."

16 When you wrote that, what  
17 did you intend to do to Ms.  
18 Robinson?

19 A. Call her out for all of her  
20 lies and mistreatment of me,  
21 mistreatment of my boyfriend,  
22 mistreatment of her coworkers,  
23 mistreatment of the entire office  
24 actually. That is what I was going  
25 to call her out on. The stuff she

1 T. CHEN  
2 was stealing, the way she was  
3 messing with the townhouse whenever  
4 she would be the only one there,  
5 just ruining my things. I was going  
6 to confront her with all of this.

7 MS. MACMULLIN: We are  
8 going to move to the next  
9 document, which is Bates  
10 stamped Canal 0047301 through  
11 303, and this will be marked  
12 as Plaintiff's Exhibit 89.

13 (Whereupon, Plaintiff's  
14 Exhibit 89, Canal 0047301  
15 through 303, was marked for  
16 identification, as of this  
17 date.)

18 Q. Ms. Chen, this is a series  
19 of text messages between you and Lu  
20 Lu White.

21 A. Uh-huh.

22 Q. Looking at the second page  
23 of the document?

24 A. Uh-huh.

25 Q. At 3:32 p.m., you wrote,

1 T. CHEN

2 "She is not to be involved with  
3 anything going forward?"

4 A. Yes.

5 Q. Were you referring to Ms.  
6 Robinson?

7 A. Yes.

8 Q. And what did you mean by,  
9 "She is not to be involved with  
10 anything going forward?"

11 A. She is not to be involved  
12 -- at this point, Chase had been  
13 taken off the townhouse. She had  
14 been told to stay out of the  
15 townhouse. This is why I was  
16 working with Lu Lu. Because she  
17 hired her as her assistant for the  
18 townhouse. She had instructed Lu Lu  
19 that she did not work for Canal, she  
20 did not work for Robert De Niro, she  
21 only worked for her. And I am going  
22 to repeat, Lu Lu was hired by Chase  
23 with Bob's permission to complete  
24 the townhouse because Chase was  
25 always complaining she has too much

1 T. CHEN  
2 work to do and can't get anything  
3 done. So she hired Lu Lu, and now  
4 she tells Lu Lu that part of her job  
5 is to protect Bob from being  
6 audited. She has Lu Lu look up  
7 everything online that they buy,  
8 referencing the receipts, and  
9 stapling them -- the picture of  
10 whatever she prints out online to  
11 the receipt. I don't know of  
12 anybody who thinks that you could  
13 protect really anyone from an audit  
14 by doing that, let alone hiring  
15 somebody for the townhouse, but then  
16 bringing her into this ridiculous  
17 project that doesn't make any sense.  
18 That she never even spoke with Bob  
19 about or even the accountant about.  
20 Bob has an accountant who does  
21 everything, financially. And this  
22 one is just nuts. So she was not to  
23 be involved at the townhouse anymore  
24 because obviously she was not doing  
25 her job there, she was being rude

1 T. CHEN

2 and obnoxious.

3 Q. And who made the decision  
4 that Ms. Robinson was not to be  
5 involved with anything going  
6 forward?

7 A. I never said that. I said  
8 never involved with anything at the  
9 townhouse going forward, because she  
10 had already proven she was rude,  
11 obnoxious and incapable because she  
12 didn't get anything done.

13 Q. And you wrote at 3:32 p.m.,  
14 "She is not involved -- not to be  
15 involved with anything going  
16 forward?"

17 A. Yeah, because I am working  
18 on townhouse with the person she  
19 hired to work on the townhouse, and  
20 then got this kid involved with  
21 protecting Bob from an audit by  
22 saving a whole bunch of demented  
23 receipts and having this girl look  
24 up everything online that matched  
25 the receipt, print it out, and

1 T. CHEN

2 staple the picture to the receipt.

3 Lu Lu was meant to always work at  
4 the townhouse. So yes, when I speak  
5 to Lu Lu and I say that she should  
6 not be involved in anything, I am  
7 speaking only about the townhouse.

8 Q. And when you wrote that to  
9 Ms. White that she is not to be  
10 involved with anything going  
11 forward, who made that decision?

12 A. Bob and I. Although, Chase  
13 made that decision herself because  
14 she never did any work at the  
15 townhouse. She came in to just  
16 berate, abuse, and yell at everybody  
17 all the time. It was a very toxic  
18 environment. Even Lu Lu -- she  
19 hired Lu Lu to work at the  
20 townhouse. But when Lu Lu met me at  
21 the townhouse, Lu Lu got reprimanded  
22 for talking to me. Chase told her  
23 that she was not to talk to me or  
24 have anything to do with me because  
25 she hates me. This is what she told

1 T. CHEN  
2 her assistant. That is not  
3 professional. Especially when you  
4 hire somebody to work in my home.  
5 So of course I wanted her out of the  
6 townhouse. Which she also hired an  
7 interior designer for, who was doing  
8 all the stuff that she is claiming  
9 was assigned to her. She kept  
10 taking over responsibilities that  
11 she would never execute at the  
12 townhouse.

13 MS. MACMULLIN: So moving  
14 to the next document, which  
15 is Bates stamped 0036475.  
16 And we will mark that as  
17 Plaintiff's Exhibit 90.

18 (Whereupon, Plaintiff's  
19 Exhibit 90, 0036475, was  
20 marked for identification, as  
21 of this date.)

22 Q. Mr. Chen, in the fourth  
23 paragraph you see where you wrote,  
24 "Chase is no longer involved with  
25 anything regarding the townhouse or

1 T. CHEN

2 the twins. You are not to discuss  
3 anything with her that you discuss  
4 with us. Any e-mails between us are  
5 not to be shared with Chase?"

6 A. Yes.

7 Q. Who made the decision that  
8 Ms. Robinson would not be involved  
9 with anything regarding the  
10 townhouse or twins?

11 A. Bob and I.

12 Q. And who made the decision  
13 that Ms. White should not discuss  
14 anything with Ms. Robinson that was  
15 discussed with you?

16 A. Bob and I.

17 Q. Who made the decisions that  
18 any e-mails between you would not be  
19 shared with Ms. Robinson?

20 A. It was probably a decision  
21 I made off of the decisions that Bob  
22 and I made together. If she is not  
23 to be shared information that  
24 includes e-mails. And I want it to  
25 be thorough. Chase is sneaky. You

1 T. CHEN

2 have to be very very thorough.

3 (Whereupon, a discussion  
4 was held off the record.)

5 MS. MACMULLIN: So we  
6 will move on to the next  
7 document, which is Bates  
8 stamped Canal 0046701, and we  
9 will mark that as Plaintiff's  
10 Exhibit 91.

11 (Whereupon, Plaintiff's  
12 Exhibit 91, Canal 0046701,  
13 was marked for  
14 identification, as of this  
15 date.)

16 A. Can I run to the bathroom  
17 again?

18 Q. Sure. Yes.

19 MS. MACMULLIN: We will  
20 go off the record.

21 THE VIDEOGRAPHER: The  
22 time is now 1:49 p.m. We are  
23 off the record.

24 (Whereupon, a recess was  
25 taken at this time.)

1 T. CHEN

2 THE VIDEOGRAPHER: The  
3 time is now 1:51 p.m. We are  
4 back on the record.

5 Q. So Ms. Chen, looking at  
6 what has been marked as Plaintiff's  
7 Exhibit 91, do you see where you  
8 wrote, "Bob and I would like to  
9 inform you that Chase is no longer  
10 involved with any of our projects?"

11 A. Yes.

12 Q. Who made the decision that  
13 Ms. Robinson was no longer involved  
14 with your and Mr. De Niro's  
15 projects?

16 A. I think it is important to  
17 state who is being e-mailed in this.  
18 It is the interior designer of the  
19 townhouse.

20 Q. Right.

21 So when you wrote, "Chase  
22 is no longer involved with any of  
23 our projects," who made that  
24 decision?

25 A. Bob and I. She should not

1 T. CHEN

2 be involved at the townhouse  
3 anymore. We wanted her just in the  
4 office. She wouldn't go away.

5 MS. MACMULLIN: We are  
6 going to move to the next  
7 document, which is Bates  
8 stamped Canal 0048185 through  
9 187.

10 (Whereupon, Plaintiff's  
11 Exhibit 92, Canal 0048185  
12 through 187, was marked for  
13 identification, as of this  
14 date.)

15 THE WITNESS: 185 through  
16 187.

17 Q. Ms. Chen this is a text  
18 conversation between you, Ms. Spear,  
19 and Ms. Weeks-Britain. If your turn  
20 to page two?

21 A. Uh-huh.

22 Q. You write, at 10:23 a.m.,  
23 "I am sure you guys saw the e-mail  
24 or will see them soon, any support  
25 you need in the office should come

1 T. CHEN

2 from Lu Lu. I will make this very  
3 clear in an additional e-mail. If  
4 there are any problems on your end,  
5 if Chase tries to step in and  
6 delegate in any way, you just simply  
7 take control and say Lu Lu is to  
8 assist and provide support for you  
9 two. Assert your authority. If you  
10 deem it appropriate for Lu Lu to  
11 help for a moment, it is up to you.  
12 But Lu Lu is your support not  
13 Chase's. This comes from Bob, and  
14 you can say that if she tries to get  
15 out of line."

16 A. Yes.

17 Q. When you wrote, "This comes  
18 from Bob," did Mr. De Niro authorize  
19 everything that you wrote in this  
20 text message?

21 A. Yes. Otherwise I would not  
22 say it.

23 Q. So moving forward, Ms.  
24 Robinson would not be able to  
25 provide any assignments to Ms.

1 T. CHEN

2 Weeks-Britain, is that correct?

3 A. Well, could you repeat  
4 that?

5 Q. Yes. Moving forward, Ms.  
6 Robinson would not be able to  
7 provide any assignments to Ms.  
8 Weeks-Britain, is that correct?

9 A. Well, in the text I am  
10 telling them that if they need  
11 support they should go to Lu Lu. I  
12 am not talking about the  
13 authentication of anything. I am  
14 telling them if they need support.  
15 They were now allowed to use Lu Lu  
16 because Chase was no longer allowed  
17 to have an iron hand over that.

18 Q. You write, "If Chase tries  
19 to step in and delegate in any way,  
20 you should simply take control."

21 What did you mean by that?

22 A. Don't let her speak to you  
23 disrespectfully. Stand up to her  
24 when she is rude and when she is  
25 nasty. She should be professional.

1 T. CHEN

2 You guys are in an office working  
3 together. Her behavior has been  
4 unacceptable.

5 Q. When you write, "If Chase  
6 tries to step in and delegate in any  
7 way," what did you mean by delegate?

8 A. If she comes in and behaves  
9 disrespectful, barking orders. She  
10 can ask for help, but she cannot be  
11 rude.

12 Q. Ms. Robinson -- okay.

13 We are going to move on --  
14 I'm sorry. To rephrase.

15 In early April 2019, you  
16 mention that you were arranging a  
17 meeting between Mr. De Niro, Ms.  
18 Robinson, and Canal employees,  
19 correct?

20 A. I mean, it was something  
21 that was -- we had all talked about  
22 happening. Bob and I spoke about  
23 happening.

24 Q. And who was planning to  
25 participate in this meeting?

1 T. CHEN

2 A. Everybody she has insulted,  
3 everybody who had an issue with her,  
4 everybody she screamed at, everybody  
5 she abused. They were entitled to  
6 have their voice heard.

7 Q. What were the names of the  
8 people that were going to  
9 participate in the meeting?

10 A. It was me, Bob, Sabrina,  
11 Jillian, Michael Kaplan. That is  
12 all I can remember offhand. If  
13 there was anybody else that she had  
14 been disrespectful to, they would  
15 have been invited to the meeting as  
16 well. She hurt a lot of people that  
17 Bob trusts very much and had been  
18 very wonderful employees. She hurt  
19 a lot of people very badly.

20 Q. And what was the planned  
21 purpose for this meeting?

22 A. For everybody to be able to  
23 say to her what she has done to them  
24 and how it has made them feel, call  
25 her out for her stealing and lies,

1 T. CHEN  
2 to see if there was a way we could  
3 come to a conclusion. If there was  
4 something going on in her life that  
5 maybe she was emotional. I don't  
6 know. We were just trying to hope  
7 for the best and hope for the best  
8 even though we were getting the  
9 worst all the time. We were  
10 actually wanting to have the meeting  
11 to try and just figure out how we  
12 could just get her back into the  
13 office, and get her back to that  
14 place where Bob felt she had done so  
15 well. A lot -- I was actually  
16 shocked at the number of people who  
17 she had abused over the years. Some  
18 people quit their jobs, one person  
19 moved because she had threatened  
20 them so badly. As I was finding out  
21 more, I felt that this is -- this is  
22 not right. When somebody is this  
23 abusive, they need to be called out  
24 on it. Not necessarily punished,  
25 but when there is amount of insanity

1 T. CHEN

2 going on, this many years of abuse,  
3 you just wonder what has happened to  
4 this person. Is there anything we  
5 can do to help because they are  
6 driving us crazy. You give them  
7 that one chance, that one  
8 opportunity, hope you can do right  
9 by them. But most of all, you have  
10 to do right by yourself.

11 Q. Did you ever offer to help  
12 Ms. Robinson?

13 A. To -- yeah. When I would  
14 talk to Bob. I would always talk to  
15 him. Because when she looked at me,  
16 she looked like she wanted to kill  
17 me. She couldn't even keep eye  
18 contact half the time, and then she  
19 would just get very jittery and have  
20 this weird laugh she did. I could  
21 read that I made her very  
22 uncomfortable. So there was no way  
23 I would ever approach somebody who  
24 I made uncomfortable with how can I  
25 help you. Let me -- I feel like

1 T. CHEN

2 there is -- they don't want to hear  
3 it from me. I said to Bob, "I think  
4 she seems to look up to you in a  
5 certain way. I think it is a bit  
6 obsessive, but you are a voice that  
7 she would perhaps listen to better.  
8 But I think that, you know,  
9 everybody that she has abused,  
10 should have -- they have the right  
11 to confront her about it.

12 MS. MACMULLIN: We are  
13 going to move now to a  
14 document that is Bates  
15 stamped Canal 0046709, which  
16 I will mark as Plaintiff's  
17 Exhibit 93.

18 (Whereupon, Plaintiff's  
19 Exhibit 93, Canal 0046709,  
20 was marked for  
21 identification, as of this  
22 date.)

23 A. It is just one page?

24 MS. MACMULLIN: It does  
25 go on to 710.

1 T. CHEN

2 Q. Ms. Chen, where you wrote,  
3 "I think she knows what was coming,  
4 and none of it was going to be in  
5 her favor," as of the time that you  
6 sent this e-mail, what was coming to  
7 Ms. Robinson?

8 A. The meeting where we were  
9 going to allow everyone to say the  
10 bad things she had done to them in  
11 front of her boss, and in front of  
12 me because she did it in my  
13 household to people, and I don't  
14 permit that.

15 MS. MACMULLIN: Moving to  
16 the next document, which is  
17 Bates stamped Canal 0048188.

18 MR. WARD: Through?

19 MS. MACMULLIN: 190.

20 We will mark this as  
21 Plaintiff's Exhibit 94.

22 (Whereupon, Plaintiff's  
23 Exhibit 94, Canal 0048188,  
24 was marked for  
25 identification, as of this

1 T. CHEN

2 date.)

3 Q. Ms. Chen, that is a text  
4 conversation between you, Ms. Spear,  
5 and Ms. Weeks-Britain. If you look  
6 at page two, at 10:29 p.m., you  
7 wrote, "She just resigned." At  
8 10:32 p.m., you wrote, "I am so  
9 happy to be able to share the good  
10 news."

11 A. Yes.

12 Q. Were you glad that Ms.  
13 Robinson resigned?

14 A. Yes.

15 Q. Why?

16 A. Because I thought she  
17 mainly did it for her own mental  
18 health. And I thought it was a very  
19 strong move to make after having  
20 been at a place for so long. I  
21 thought it was the first admirable  
22 thing she had done. It was a very  
23 big move for her, and I was kind of  
24 happy because I thought she was she  
25 was going to move into where she

1 T. CHEN  
2 really wanted to be, where she had  
3 always expressed was not working for  
4 Bob during our period with her. I  
5 was actually -- I was really happy  
6 for her. I was relieved for us. We  
7 didn't have this extra drama. We  
8 are way too busy for the drama that  
9 she brought every day, and it also  
10 showed she wasn't happy. So I felt  
11 like that was a great move on her  
12 part. And we are all happy to not  
13 be yelled at and screamed at on a  
14 daily basis, and cursed at. I was  
15 very happy that Bob would not be  
16 cursed at by her anymore. It was a  
17 relief because the one thing I  
18 despise the most is when the people  
19 I love are getting abused when they  
20 are being good to people.

21 Q. How did Mr. De Niro react  
22 to Ms. Robinson's resignation?

23 A. He didn't really want to  
24 talk about it. I feel like he was  
25 -- he was more quiet in a way that

1 T. CHEN  
2 seemed disappointed. But, you know,  
3 he actually, he said the same thing.  
4 He was like, "You know, You know I  
5 am happy for her. She can move on  
6 now."

7 MS. MACMULLIN: We are  
8 going to turn to the next  
9 document, which is Bates  
10 stamped Canal 0047465 through  
11 471, which I will mark as  
12 Plaintiff's Exhibit 95.

13 (Whereupon, Plaintiff's  
14 Exhibit 95, Canal 0047465  
15 through 471, was marked for  
16 identification, as of this  
17 date.)

18 A. 465 to 471?

19 Q. Exactly.

20 A. Okay.

21 Q. There is a conversation  
22 between you and Mr. Kaplan. If you  
23 turn to page four of the document,  
24 at 12:42 p.m., you wrote, "She is  
25 going to try anything to get him to

1 T. CHEN

2 contact her now and pretend like she  
3 is still somehow valid there." And  
4 then at 12:43 p.m., you wrote, "I  
5 just want to forget her and never  
6 have her be able to open up a line  
7 of communication with Bob again."

8 A. Yes.

9 Q. You didn't want Mr. De Niro  
10 to communicate with Ms. Robinson  
11 ever again, is that correct?

12 A. No. You are reading texts  
13 that are not absolute statements  
14 that I am making like that. These  
15 are personal texts. I did not want  
16 her to be able to abuse my boyfriend  
17 again, and that is all she ever did  
18 whenever she was in front of him.  
19 It was like she was trying to show  
20 off how nasty and disrespectful she  
21 could be to him all the time. That  
22 is what I did not want. That is  
23 what everybody saw all the time from  
24 her towards my boyfriend.

25 MR. DROGIN: The record

1 T. CHEN

2 should also reflect that you  
3 skipped a text. You read as  
4 though those were consecutive  
5 texts and they are not. What  
6 you omitted says, "Tom says  
7 he just wants to make things  
8 as easy as possible."

9 If you are going to read  
10 texts, you got to read what  
11 comes between them. You  
12 can't omit. It is like  
13 omitting a sentence.

14 Q. Ms. Chen, did you tell Mr.  
15 De Niro that you did not want Ms.  
16 Robinson to communicate with him?

17 A. Say that again?

18 Q. Did you tell Mr. De Niro  
19 that you did not want Ms. Robinson  
20 to communicate with him?

21 A. No. He is a grown man. I  
22 would never make that kind of  
23 statement.

24 Q. If we turn to page seven of  
25 the document?

1 T. CHEN

2 A. Seven.

3 Q. Which is the last page?

4 A. Uh-huh.

5 Q. At 4:10 p.m., you wrote,  
6 "Have you heard from the graham  
7 cracker yet?"

8 A. Yes.

9 Q. In that text, were you  
10 referring to Ms. Robinson?

11 A. Well, her first name is  
12 Graham.

13 Q. So yes?

14 A. Yes.

15 MR. DROGIN: Do you want  
16 to ask if maybe that was an  
17 auto text correction  
18 (inaudible) Chase or did you  
19 leave it out there.

20 MS. MACMULLIN: Counsel,  
21 the commentary is  
22 inappropriate.

23 MR. DROGIN: I apologize.  
24 I just thought it might be a  
25 question that you would want

1 T. CHEN

2 to ask.

3 MS. MACMULLIN: We are  
4 going to turn to the next  
5 document, which is Bates  
6 stamped Canal 0048605 through  
7 610, which I will mark as  
8 Plaintiff's Exhibit 96.

9 (Whereupon, Plaintiff's  
10 Exhibit 96, Canal 0048605  
11 through 610, was marked for  
12 identification, as of this  
13 date.)

14 A. Can you give the numbers  
15 again?

16 Q. Of course. 0048605 through  
17 610.

18 These are text messages  
19 that you exchanged with Mr. De Niro?

20 A. Uh-huh.

21 Q. And turning to page three  
22 of the document?

23 A. Uh-huh.

24 Q. You wrote, at 8:30 p.m., "I  
25 really hope he didn't give Chase

1 T. CHEN

2 severance?"

3 A. Uh-huh.

4 MR. WARD: Say yes.

5 A. Yes.

6 Q. Was there a discussion

7 about Mr. De Niro paying Ms.

8 Robinson severance?

9 A. I had always said from the

10 top since she resigned and had

11 stolen so much, she has already

12 given her a severance. But then I

13 add my two cents in, I said, "I

14 don't think she deserves a

15 severance," and Bob wanted to give

16 her a severance.

17 Q. Ms. Chen, at a certain

18 point you began looking into Ms.

19 Robinson's spending on the

20 townhouse, is that correct?

21 A. Not Chase so much, no.

22 MS. MACMULLIN: We are

23 going to move to the next

24 document, which is Bates

25 stamped Canal 0049474 through

1 T. CHEN

2 478.

3 (Whereupon, Plaintiff's  
4 Exhibit 97, Canal 0049474  
5 through 478, was marked for  
6 identification, as of this  
7 date.)

8 Q. This is a text conversation  
9 between you, Jillian Spear, and Ms.  
10 Weeks-Britain.

11 A. Uh-huh.

12 Q. And if you can turn to page  
13 three of the document?

14 A. Uh-huh.

15 Q. Your message at 5:42 p.m.,  
16 you wrote, "Hey guys. It was  
17 brought to our attention that during  
18 Chase's spending spree here instead  
19 of returning items she opted to give  
20 things away."

21 A. Uh-huh.

22 Q. When you wrote, "Chase's  
23 spending spree here," what were you  
24 referring to?

25 A. Everything she bought at

1 T. CHEN

2 the townhouse, and I saw there was  
3 days that I went in that there was a  
4 bunch of stuff that all of sudden  
5 would go missing. And her  
6 assistant, Lu Lu, had told me that  
7 she would just give things away.  
8 She gave a bunch of stuff away to Lu  
9 Lu. When Chase noticed that I got  
10 rid of the plates she bought for the  
11 house that had love on the underside  
12 of the plate, on the lip. I thought  
13 it was very inappropriate that she  
14 would buy that and set it in eyeline  
15 right when you walk into the  
16 kitchen. When I got rid of that, Lu  
17 Lu said she got pissed, and then had  
18 ordered a formal dining set for the  
19 townhouse. She then started giving  
20 it away.

21 Q. When you wrote, "It was  
22 brought to our attention that during  
23 Chase's spending spree here instead  
24 of returning items, she often would  
25 give things away," who brought this

1 T. CHEN

2 accusation to your attention?

3 A. Michael Kaplan, and her  
4 assistant, Lu Lu White, who  
5 inherited much of what she was  
6 giving away. And she said she was  
7 now disgusted to go home and look at  
8 her lamp and know that she took  
9 Helen's lamp without permission.

10 Q. So when the investigation  
11 into Ms. Robinson began, the concern  
12 was that Ms. Robinson was spending a  
13 lot on your apartment with Mr. De  
14 Niro, is that correct?

15 A. I guess, yes.

16 MR. DROGIN: Can I ask  
17 the witness not to guess?  
18 And can you clarify what  
19 investigation you are talking  
20 about?

21 MS. MACMULLIN: I am  
22 talking about Ms. Chen's text  
23 message here looking into  
24 Chase's spending.

25 A. I wouldn't say that I was

1 T. CHEN  
2 looking into her spending. Her  
3 spending habits were brought to me  
4 and then when I would see things at  
5 the house, that had been unpacked,  
6 but never put in the house, and all  
7 of a sudden missing, I questioned  
8 where those things were. So her  
9 actions brought things to my  
10 attention that she was doing  
11 dishonestly.

12 MR. DROGIN: Counsel, I  
13 am just not clear that the  
14 witness ever used the word  
15 investigation. You did. If  
16 I am wrong, I am wrong. The  
17 record will be what it will  
18 be.

19 THE WITNESS: No. I  
20 never said investigation. I  
21 even think I stated that I  
22 wasn't part of an  
23 investigation on the previous  
24 document. There was no  
25 investigation. People were

1 T. CHEN

2 coming to me.

3 MR. DROGIN: This is part  
4 of your pattern of putting  
5 things into the record that  
6 don't exist. I would ask you  
7 not to do it as I have in  
8 other depositions.

9 MS. MACMULLIN: We can  
10 move onto a document that is  
11 Bates stamped Canal 0046715,  
12 which we will mark as  
13 Plaintiff's Exhibit 98.

14 (Whereupon, Plaintiff's  
15 Exhibit 98, Canal 0046715,  
16 was marked for  
17 identification, as of this  
18 date.)

19 A. It is just one page?

20 Q. It is.

21 You wrote, "Bob wants all  
22 of Chase's charge and expenses.  
23 Everything she has been spending."

24 What specifically did Mr.  
25 De Niro say to you in advance of you

1 T. CHEN

2 sending this e-mail?

3 A. Have Tasch send me all of  
4 her charges and all of her spending.  
5 I want to know how much petty cash,  
6 too.

7 Q. What prompted Mr. De Niro  
8 to request this information?

9 A. Her resignation. And  
10 everybody coming to us telling us  
11 that she had been stealing.

12 Q. What was your understanding  
13 of what this information would be  
14 used for?

15 A. I wasn't told. I just was  
16 told to send an e-mail to the  
17 accountant that Bob wanted that  
18 information, and it would go  
19 directly to Bob. I mean, when  
20 somebody is stealing from you, you  
21 kind of want to know how much. I  
22 think that is common sense.

23 Q. Who told you that Chase was  
24 stealing?

25 A. Michael Kaplan -- Michael

1 T. CHEN

2 Kaplan, I believe Robin Chambers had  
3 mentioned things about her. Sabrina  
4 and Jillian had always mentioned how  
5 she just spent off the wall. Like  
6 because she is showing off all the  
7 time. It would come out when you  
8 are not talking about what she is  
9 spending. But you are talking about  
10 her bad behaviors. Because it was  
11 complete lunacy. You are trying to  
12 figure out this person, how to work  
13 with her, how to get things to move  
14 smoothly, and every now and then  
15 somebody comes out with well, she  
16 loves spending money, or she is  
17 really happy she is always over  
18 ordering, or always doing this with  
19 money, and with the petty cash,  
20 flashing it. It comes up in  
21 conversation.

22 Q. Did Michael Kaplan use the  
23 word stealing?

24 A. Yes. Because she had  
25 stolen -- she had transferred points

1 T. CHEN

2 out of Bob's account without his  
3 permission, and Michael Kaplan said  
4 to me, "Chase might tell you that  
5 she only did that because I had told  
6 her I had transferred points out of  
7 Bob's account to pay for a trip of  
8 mine, but I had his permission." He  
9 said ever since he told Chase about  
10 that, that is when she started  
11 transferring AMEX points into her  
12 personal account, and he had  
13 knowledge of it. And her spending  
14 of the petty cash, which was  
15 unethical.

16 Q. Did Robin Chambers use the  
17 word stealing?

18 A. I can't remember. But she  
19 did say Chase was dishonest, Chase  
20 was crazy, and that she was worried  
21 about Chase's obsession with Bob  
22 because it has become very -- she  
23 felt that she saw that it became  
24 very serious, and had said that  
25 Chase had been calling her about it

1 T. CHEN

2 and sounded crazy.

3 Q. After Ms. Robinson resigned  
4 from Canal, there was an  
5 investigation in to her, is that  
6 correct?

7 A. Yes.

8 Q. Please identify everyone  
9 who was involved in investigating  
10 Ms. Robinson?

11 A. I don't have that  
12 information. It was none of my  
13 business.

14 Q. Were you involved in  
15 investigating Ms. Robinson?

16 A. No.

17 Q. You didn't have any  
18 involvement in the investigation in  
19 to Ms. Robinson?

20 A. Investigation? People came  
21 to me with information. I shared  
22 the information that was given to  
23 me. It was over a period of years.  
24 There --

25 (Technical interference)

1 T. CHEN

2 MR. DROGIN: We lost the  
3 witness.

4 MS. MACMULLIN: Let's go  
5 off the record.

6 THE VIDEOGRAPHER: The  
7 time is now 2:18 p.m. We are  
8 off the record.

9 (Whereupon, a recess was  
10 taken at this time.)

11 THE VIDEOGRAPHER: The  
12 time is now 2:45 p.m. We are  
13 back on the record.

14 Q. Ms. Chen, to your  
15 knowledge, did Michael Kaplan ever  
16 engage in any financial wrongdoing?

17 A. Yes.

18 Q. What financial wrongdoing  
19 did Mr. Kaplan engage in?

20 A. He was spending -- sorry.  
21 He was spending petty cash  
22 inappropriately and not giving  
23 proper accounting.

24 Q. To your knowledge, was Mr.  
25 Kaplan ever investigated for

1 T. CHEN

2 engaging in financial wrongdoing?

3 A. I think so. Along with  
4 Chase.

5 Q. Who expressed concerns  
6 about Mr. Kaplan engaging in  
7 financial wrongdoing?

8 A. I can't remember. I can't.  
9 I can't remember.

10 Q. And who was involved in  
11 investigating Mr. Kaplan?

12 A. Probably the accountant,  
13 Michael Tasch.

14 Q. Over what period of time  
15 did Mr. Kaplan engage in financial  
16 wrongdoing?

17 A. I don't know. He had been  
18 employed by Bob for a very long  
19 time. I don't know the -- the  
20 details of his employment, what  
21 happened.

22 Q. What specifically did Mr.  
23 Kaplan do wrong with respect to  
24 petty cash?

25 A. It involved -- one thing I

1 T. CHEN  
2 remember it involved Chase, Robin,  
3 and Michael. It was just very  
4 strange. Everything -- I had people  
5 coming to me saying they weren't  
6 paid, and I understood that Chase  
7 took care of that, and Michael took  
8 care of that to a certain degree.  
9 So when I found out that people  
10 weren't getting paid, but he was  
11 writing down that he was paying  
12 people, it was sort of obvious that  
13 they weren't getting their money,  
14 but he was saying that that was the  
15 money was going to -- that that was  
16 what they money was going to.

17 Q. Did Mr. Kaplan pocket money  
18 that belonged to Canal for himself?

19 A. I don't know.

20 MS. LAZZARO: Objection  
21 to the form.

22 A. I never spoke to him about  
23 that. I just know people came to me  
24 and said that I am not getting paid.

25 Q. Did Mr. Kaplan engage in

1 T. CHEN

2 any inappropriate spending?

3 A. I mean, if people are  
4 coming to me and saying they didn't  
5 get paid, and he is saying that he  
6 paid them with the money he is  
7 giving on an expense report,  
8 something inappropriate is going on.  
9 But I don't know what he is doing  
10 personally.

11 Q. Was Mr. Kaplan accused of  
12 improperly receiving reimbursement  
13 for vacation days?

14 MS. LAZZARO: Objection  
15 to the form.

16 A. I heard something after  
17 that. I just want to make sure I  
18 heard everything.

19 MS. LAZZARO: Objection  
20 to the form.

21 Q. You can answer.

22 A. I do answer? Okay. I'm  
23 sorry. Could you ask the question  
24 again?

25 Q. Yes.

1 T. CHEN

2 Was Mr. Kaplan accused of  
3 improperly receiving reimbursement  
4 for vacation days?

5 A. Yes. He and Chase. It had  
6 come -- I forget who mentioned it,  
7 but it mentioned that like Chase  
8 loves to state that she works so  
9 hard, she never takes vacation, but  
10 she is on vacation all the time.  
11 You can't get her on the phone, and  
12 she did not give us the codes for  
13 the alarm to the house so the fire  
14 department showed up because the  
15 same thing she would do, she was  
16 claiming to never take vacation, she  
17 was always away. And asking to be  
18 reimbursed for the time that she  
19 pretended she wasn't on vacation,  
20 even though she was always on  
21 vacation.

22 Q. So my question was about  
23 Mr. Kaplan. And I was wondering if  
24 Michael Kaplan was accused of  
25 improperly receiving reimbursement

1 T. CHEN

2 for vacation days?

3 MS. LAZZARO: Objection

4 to the form.

5 THE WITNESS: Do I

6 answer?

7 MR. WARD: Yes.

8 A. I am not one hundred

9 percent sure if he had been formally

10 accused, but I do know that it came

11 up that this was a game that he and

12 Chase -- this as like an agreement

13 that they had with each other.

14 Q. By whom was he accused of

15 improperly receiving reimbursement

16 for vacation days?

17 MS. LAZZARO: Objection

18 to the form.

19 A. I don't know who. I don't

20 remember who. I just know that we

21 knew that they were doing this.

22 Because he is always on vacation and

23 he is claiming pay for vacation day.

24 I mean, it is obvious. It is in

25 front of you.

1 T. CHEN

2 Q. To your knowledge, was Mr.  
3 Kaplan required to return any funds  
4 to Canal?

5 A. I don't know.

6 Q. To your knowledge, was Mr.  
7 Kaplan disciplined in any way in  
8 connection with his employment?

9 A. I have no idea.

10 Q. To your knowledge, did  
11 Canal ever file a lawsuit against  
12 Mr. Kaplan?

13 A. I don't know.

14 Q. As far as you are aware,  
15 did Mr. De Niro ever consider  
16 bringing a lawsuit against Mr.  
17 Kaplan?

18 MS. LAZZARO: Objection  
19 to the form.

20 THE WITNESS: Do I  
21 answer?

22 MR. WARD: Yes.

23 A. I don't know.

24 Q. Are you aware of Mr. De  
25 Niro ever considering bringing a

1 T. CHEN

2 lawsuit against Mr. Kaplan?

3 A. I said that I don't know.

4 Q. Was Robin Chambers accused  
5 of stealing?

6 A. What?

7 MS. LAZZARO: Objection  
8 to the form.

9 Q. Was Robin Chambers accused  
10 of stealing?

11 A. By who?

12 Q. By anyone affiliated with  
13 Canal?

14 MS. LAZZARO: Objection  
15 to the form.

16 A. Yes.

17 Q. Who accused Ms. Chambers of  
18 stealing?

19 A. I would -- I want be to  
20 careful with the use of words. I do  
21 not believe that they said she was  
22 -- they didn't use the word  
23 stealing, but she had been taking  
24 advantage for years.

25 Q. And who accused Ms.

1 T. CHEN

2 Chambers of taking advantage for  
3 years?

4 A. Michael Tasch, the  
5 accountant.

6 Q. What did Mr. Tasch  
7 specifically say about how Ms.  
8 Chambers took advantage?

9 A. That is all. That she had  
10 taken advantage for years, just like  
11 Chase.

12 Q. What had Ms. Chambers  
13 allegedly taken advantage of?

14 MR. WARD: Objection.  
15 You can answer.

16 A. The petty cash that Chase  
17 and Kaplan had access to. The three  
18 of them.

19 MS. MACMULLIN: We are  
20 going to introduce a document  
21 that is Bates stamped Canal  
22 0048784 through 787.

23 (Whereupon, Plaintiff's  
24 Exhibit 99, Canal 0048784  
25 through 787, was marked for

1 T. CHEN

2 identification, as of this  
3 date.)

4 Q. Ms. Chen, this is a  
5 conversation between you and Mr. De  
6 Niro?

7 A. Uh-huh.

8 Q. Can you turn to page four  
9 of the document?

10 A. Uh-huh.

11 MR. DROGIN: This is 99,  
12 right?

13 MS. MACMULLIN: Thank  
14 you. Yes. This is Exhibit  
15 99.

16 Q. Looking at your text  
17 message at 9:09 p.m., at the bottom  
18 of the page?

19 A. Wait. Which one am I on?

20 MR. WARD: What Bates  
21 number?

22 MS. MACMULLIN: The Bates  
23 number should be 0048784.

24 A. What time?

25 Q. 9:09 p.m.?

1 T. CHEN

2 A. Yes. Yes. Right.

3 Q. So look at the bottom of  
4 your message, the last three lines,  
5 you write, "Even though I know he  
6 has been dipping into the petty  
7 cash, what's more important is that  
8 the archiving get set up to speed  
9 and solid. The petty cash is going  
10 to get managed going forward which  
11 is the important thing. I think it  
12 is important to stay forward  
13 thinking, instead of allowing  
14 "thinking back" to stall much needed  
15 progress."

16 A. Yep.

17 Q. When you wrote that Michael  
18 Kaplan had been dipping into petty  
19 cash, what did you mean?

20 A. He, along with Chase, had  
21 been giving money to Robin. And  
22 Robin was telling me one number she  
23 was getting from them, and they were  
24 telling me other numbers. So I knew  
25 they were playing around with the

1 T. CHEN

2 numbers, and I'm not quite sure  
3 where the money was going, but the  
4 numbers weren't right. But it is  
5 also -- at the same time it is petty  
6 cash. I think the biggest problem  
7 was how dishonest and terrible Chase  
8 had been. So I figured now that she  
9 was moving on to the next chapter of  
10 her life, that what we needed to do  
11 was just forget all the silliness  
12 and just -- just move forward --

13 Q. Ms. Chen, did you and Mr.  
14 De Niro hold a meeting with Mr.  
15 Kaplan and Ms. Chambers to discuss  
16 the wrongdoings that you have  
17 described?

18 A. -- I -- no, not with both  
19 of them. Oh, wait. We finally did  
20 in a formal setting. We did.

21 Q. What was the setting of the  
22 meeting?

23 A. It was at the accountant's  
24 offices.

25 Q. And when did that meeting

1 T. CHEN

2 take place?

3 A. I can't remember exactly  
4 when. It was -- had to be late  
5 2019.

6 Q. Who participated in this  
7 meeting?

8 A. Michael Tasch, Robert De  
9 Niro, Tom Harvey, Michael Kaplan,  
10 Robin Chambers, and myself.

11 Q. And Mr. Kaplan had a chance  
12 to give his side of the story during  
13 this meeting, correct?

14 MS. LAZZARO: Objection  
15 to the form.

16 A. It is a meeting, everybody  
17 is given a voice, a fair voice.

18 Q. Did -- Ms. Chambers was  
19 given a chance to have a fair voice  
20 during that meeting, correct?

21 A. Yes.

22 Q. Tell me everything that was  
23 said during that meeting?

24 MR. WARD: Objection.

25 THE WITNESS: Do I still

1 T. CHEN

2 answer?

3 MR. WARD: Yes.

4 A. Well, it was brought up how  
5 awful a person Chase is, all the  
6 chaos she has created. All the  
7 nasty things she has done to Kaplan,  
8 all the nasty things she has done to  
9 Robin, and the way she is just very  
10 sneaky and created so many problems  
11 for Bob. And Bob had always been  
12 good to her and very trusting, and  
13 basically it was all pointing that  
14 Chase had orchestrated all of this,  
15 and was the ringleader of all of  
16 this, and they are just innocent.  
17 Chase scared them. Chase would  
18 threaten them. Robin said she would  
19 never speak to Chase ever ever  
20 again. She is just such a horrible  
21 person for what she has done to Bob.

22 Q. So during that meeting, Mr.  
23 Kaplan and Ms. Chambers blamed Ms.  
24 Robinson?

25 A. Yes.

1 T. CHEN

2 Q. I am going to ask you to  
3 turn to a document that is Bates  
4 stamped Canal 0030806 through 807.  
5 And we will mark that as Plaintiff's  
6 Exhibit 100.

7 (Whereupon, Plaintiff's  
8 Exhibit 100, Canal 0030806  
9 through 807, was marked for  
10 identification, as of this  
11 date.)

12 (Technical interference)

13 THE VIDEOGRAPHER: The  
14 time is now 3:01 p.m. We are  
15 going off the record.

16 (Whereupon, a recess was  
17 taken at this time.)

18 THE VIDEOGRAPHER: The  
19 time is now 3:25 p.m. We are  
20 back on the record.

21 Q. So Ms. Chen, if we can go  
22 back to what was marked as  
23 Plaintiff's Exhibit 100 before we  
24 lost you, that is Bates stamped  
25 Canal 0030806.

1 T. CHEN

2 A. Yes.

3 Q. So about halfway through  
4 the page, you write, "Perhaps  
5 Michael Tasch needs to help us  
6 better understand what employee  
7 expenses actually are to. Tasch  
8 could you please tell us what  
9 constitute employee expenses?"

10 A. Yes.

11 Q. What did Mr. Tasch inform  
12 you were standard office expenses  
13 for employees?

14 A. I believe he addressed that  
15 with the office himself directly,  
16 not with me.

17 Q. So Mr. Tasch never  
18 responded to this e-mail from you?

19 A. I -- I think he just spoke  
20 -- it wasn't necessary to address it  
21 with me because I think I had  
22 already discussed it with him that  
23 he should address this with the  
24 staff at Canal since he handles the  
25 numbers, and they make their

1 T. CHEN

2 requests through him. It is not  
3 something that I need to be attached  
4 to and involved with since I don't  
5 work at Canal.

6 Q. Did you have any  
7 discussions with Michael Tasch  
8 concerning what office expenses were  
9 authorized?

10 A. No.

11 Q. Did you have any  
12 discussions with Mr. De Niro about  
13 what office expenses were  
14 authorized?

15 A. No.

16 Q. You didn't have any  
17 discussion with him at any time  
18 concerning what office expenses were  
19 authorized?

20 A. Who is him?

21 Q. Mr. De Niro?

22 A. No.

23 Q. At a certain point after  
24 her resignation, Ms. Robinson sought  
25 a letter of recommendation from Mr.

1 T. CHEN

2 De Niro, is that correct?

3 A. Yes.

4 Q. When did you become aware  
5 that Ms. Robinson was seeking a  
6 letter of recommendation?

7 A. Probably the minute Bob was  
8 told that she was seeking a letter  
9 of recommendation.

10 Q. And do you recall when that  
11 was approximately?

12 A. I don't remember the date,  
13 but she was gone.

14 Q. Why were you informed so  
15 quickly?

16 A. Because I live with him.

17 Q. Did you review the draft  
18 letter of recommendation that Ms.  
19 Robinson had drafted?

20 A. I did look at it.

21 Q. And what were your  
22 impressions of it?

23 A. That she is as crazy as she  
24 showed herself to be. Completely  
25 insane. Completely insane. Nuts.

1 T. CHEN

2 There was no -- it wasn't based in  
3 reality at all. And it actually  
4 made me concerned for her, like I  
5 was really really concerned because  
6 it was so out of touch with reality.  
7 It is like she insults people and  
8 even told us that her assistant  
9 couldn't tie her shoelaces if you  
10 didn't tell her to. Who talks about  
11 people like that? And you hired her  
12 as your assistant. She is a young  
13 girl. And then she writes so  
14 glowingly about herself and  
15 everything I have seen of her is  
16 just toxic, mean, deceitful and  
17 immoral.

18 Q. What specifically in the  
19 letter seemed out of touch with  
20 reality to you?

21 A. All of it. All of it. I  
22 remember she was spouting her acumen  
23 and this that and the other. And it  
24 was all delusional. She made all  
25 the problems at Canal. She hurt a

1 T. CHEN  
2 lot of people at Canal. She was  
3 stealing from her boss. She was --  
4 she resigned, and it was not -- it  
5 was not an amicable parting away.  
6 She made everything -- she makes  
7 everything difficult. And she tried  
8 to make it seem like she was this  
9 angelic creature that created Robert  
10 De Niro. Which, in fact, is just  
11 even more of a blatant -- I hesitate  
12 to say it is a lie. It is insanity.  
13 It is completely insane. Somebody  
14 who can't even give a phone number  
15 accurately the first time, you have  
16 to go to her ten times. Somebody  
17 who was so irresponsible that she  
18 wouldn't put me on my own house's  
19 security system. Somebody who was  
20 so irresponsible they wouldn't give  
21 us the codes to deactivate the alarm  
22 of our house while she is  
23 vacationing everywhere and  
24 submitting for those vacations. She  
25 is a liar. She is such a liar. And

1 T. CHEN

2 she wrote about it with a complete  
3 -- it is insane. And I do think she  
4 needs help after seeing that letter.  
5 It was appalling.

6 Q. Did you believe that the  
7 letter overstated Ms. Robinson's job  
8 responsibilities?

9 A. Let me see. How can I word  
10 this so you actually understand me  
11 when I answer it the first time? It  
12 was completely out of touch with  
13 reality. Completely.

14 Q. Did you discuss the draft  
15 letter of recommendation with anyone  
16 else?

17 A. Anyone else? Who is anyone  
18 else?

19 Q. Anyone?

20 A. I don't know if I would say  
21 I discussed it all. It was more  
22 that I laughed about it.

23 Q. What was Mr. De Niro's  
24 reaction to the draft letter of  
25 recommendation?

1 T. CHEN

2 A. She is crazy. He said,  
3 "This is what I mean. She is crazy.  
4 And I always knew I would have a  
5 problem with her when our time would  
6 come to an end. She is absolutely  
7 insane."

8 Q. Was Mr. De Niro initially  
9 inclined to sign a letter of  
10 recommendation for Ms. Robinson?

11 A. No.

12 Q. Did you --

13 A. I mean, I think a warning  
14 letter for her would be more  
15 appropriate. She is a thief, and a  
16 con artist. She is not well in the  
17 head. Nobody would recommend her.  
18 After someone steals from you, how  
19 do you recommend her to somebody  
20 else? You are responsible. You are  
21 responsible for the person that you  
22 recommend her to. That would be --  
23 it is insane to actually recommend  
24 anybody like her for any position  
25 with anybody else that she can ruin

1 T. CHEN

2 their lives or steal from.

3 MS. MACMULLIN: We are  
4 going to look at a document  
5 that is Bates stamped Canal  
6 049788 to 049793.

7 MR. DROGIN: Say that  
8 again, please?

9 MS. MACMULLIN: It is  
10 Canal 049788 through 93, and  
11 this will be Plaintiff's  
12 Exhibit 101.

13 (Whereupon, Plaintiff's  
14 Exhibit 101, Canal 049788  
15 through 93, was marked for  
16 identification, as of this  
17 date.)

18 Q. Ms. Chen, if turn to the  
19 third page of the document, do you  
20 see in the third paragraph where you  
21 write, "I had told you on the phone  
22 and face to face at the townhouse  
23 that Bob would not sign any letter  
24 for Chase?"

25 A. Wait. Where are you

1 T. CHEN

2 talking about?

3 Q. I believe it is the third  
4 page of the document in the third  
5 paragraph. It is the paragraph that  
6 starts, "Who is this you have  
7 positioned yourself with." And then  
8 on the third line --

9 A. I'm sorry. On page 789?

10 MS. MACMULLIN: It is  
11 790, sorry.

12 Q. So on page 790, third  
13 paragraph, third line, "I had told  
14 you on the phone and face to face at  
15 the townhouse that Bob would not  
16 sign any letter for Chase?"

17 A. Okay. Yes.

18 Q. What did you and Mr. Drogin  
19 discuss when you spoke on the phone?

20 A. I think -- I can't remember  
21 the conversation exactly, but it was  
22 going to be the same as every  
23 conversation about Chase, that she  
24 is a liar, she is crazy, and she is  
25 a con artist.

1 T. CHEN

2 Q. Was anyone else on the  
3 phone during that call?

4 A. I don't think so.

5 Q. And when did that phone  
6 call take place?

7 A. I don't remember.

8 Q. Do you remember  
9 approximately when it took place?

10 A. I don't remember.

11 Q. How many discussions did  
12 you have with Mr. De Niro's lawyer  
13 about Chase's letter of  
14 recommendation?

15 MS. LAZZARO: Objection  
16 to the form.

17 A. Which lawyer?

18 Q. And let me just restate my  
19 question.

20 How many discussions did  
21 you have with any lawyer for Mr. De  
22 Niro about Ms. Robinson?

23 A. When you say, "about Ms.  
24 Robinson," how do you mean?

25 Q. Any discussions concerning

1 T. CHEN

2 Ms. Robinson?

3 A. Concerning how?

4 Q. Where Ms. Robinson was a  
5 topic of conversation?

6 A. And what was the original  
7 question again?

8 Q. How many discussions did  
9 you have with any lawyer for Mr. De  
10 Niro about Ms. Robinson?

11 MR. WARD: Objection.

12 MS. LAZZARO: Objection  
13 to the form.

14 MR. WARD: During what  
15 time period are we talking?

16 MS. MACMULLIN: At any  
17 time.

18 A. I can't recall.

19 Q. More than five  
20 conversations?

21 A. I can't recall. She wasn't  
22 somebody in my life that was that  
23 important to remember these details  
24 of when I talked about her and how  
25 much I talked about her. I just

1 T. CHEN

2 want to forget her at this point.

3 Q. How many discussions did  
4 you have with Mr. Drogin about Ms.  
5 Robinson?

6 MS. LAZZARO: Objection  
7 to the form.

8 A. I am not sure. I can't  
9 remember.

10 Q. How many discussions with  
11 Mr. Harvey did you have concerning  
12 Ms. Robinson?

13 MR. WARD: Objection.

14 MS. LAZZARO: Objection.

15 A. I can't remember.

16 MS. MACMULLIN: Turning  
17 now to a document which was  
18 Bates stamped Canal 0048796  
19 through 799, which I will  
20 mark as Plaintiff's Exhibit  
21 102.

22 (Whereupon, Plaintiff's  
23 Exhibit 102, Canal 0048796  
24 through 799, was marked for  
25 identification, as of this

1 T. CHEN

2 date.)

3 Q. Ms. Chen, this is a text  
4 conversation between you and Mr. De  
5 Niro. And if you turn to the second  
6 page, look at the first line, and  
7 you have to help me with the  
8 pronunciation. There is a reference  
9 to someone H-U-I?

10 A. Hui.

11 Q. Hui.

12 So where you wrote, "I just  
13 spoke to Hui about Laurent's  
14 ridiculous letter," who is Hui?

15 A. Pardon?

16 Q. Who is Hui?

17 A. He is a friend of mine, who  
18 is also a lawyer.

19 Q. Did you send him Mr.  
20 Drogin's draft letter?

21 A. No, I did not.

22 MR. DROGIN: Can I ask  
23 what draft letter you are  
24 talking about?

25 MS. MACMULLIN: The

1 T. CHEN

2 letter that Ms. Chen is  
3 referring to in this text  
4 message.

5 Q. Ms. Chen, did you believe  
6 it was important for Mr. De Niro to  
7 have his lawyer take a tough  
8 position against Ms. Robinson?

9 A. Pertaining to what?

10 Q. When you mention in this  
11 text message that you thought that  
12 the lawyer sounded ridiculous and  
13 weak.

14 A. Uh-huh. It didn't hold her  
15 accountable for everything she had  
16 stolen.

17 Q. Did you believe that it was  
18 important for Mr. De Niro to have  
19 his lawyer take a tough position  
20 against Ms. Robinson?

21 A. I believe that it was  
22 important that she be held  
23 accountable for her actions. If you  
24 interpret that as tough, yes.  
25 Consequences for actions

1 T. CHEN  
2 administered deliberately by Chase  
3 Robinson.

4 MS. MACMULLIN: We are  
5 going to go now to a document  
6 that was Bates stamped Canal  
7 0048662 through 664.

8 (Whereupon, Plaintiff's  
9 Exhibit 103, Canal 0048662  
10 through 664, was marked for  
11 identification, as of this  
12 date.)

13 A. It was 662 to 664?

14 Q. Exactly.

15 MS. MACMULLIN: We will  
16 mark this as Plaintiff's  
17 Exhibit 103. It is 665, I  
18 believe. Well, 665 is just a  
19 blank page.

20 A. We don't have a 662. We  
21 have 663, 664, 665. There is no  
22 662.

23 MR. DROGIN: 662 is just  
24 a cover sheet.

25 THE WITNESS: Okay.

1 T. CHEN

2 Well, we don't have a cover  
3 sheet here.

4 MR. DROGIN: You are not  
5 missing much.

6 MS. MACMULLIN: I can  
7 represent to you that the  
8 cover sheet says it is an  
9 exchange of 31 messages  
10 between you and Mr. De Niro.

11 Q. Turning to the page that  
12 has 663 at the bottom right-hand  
13 corner, and then at 5:26 p.m., you  
14 wrote, "Just spoke to Tom, we went  
15 over everything we need to look  
16 for."

17 A. Uh-huh.

18 Q. What was it that you and  
19 Mr. De Niro were looking for?

20 A. It has nothing to do with  
21 Chase.

22 Q. Okay.

23 A. It has to do with our  
24 personal lives.

25 Q. And it looks like you have

1 T. CHEN

2 just gone out of focus Ms. Chen, so  
3 if we can --

4 A. I don't know how to focus.

5 MR. WARD: Let's try  
6 this.

7 MS. MACMULLIN: Great.

8 A. Am I focused?

9 Q. Yes. Thank you.

10 A. Okay.

11 MS. MACMULLIN: So we can  
12 move on now to a document  
13 that is Bates stamped Canal  
14 0048627 through 630. We will  
15 mark this as Plaintiff's  
16 Exhibit 104.

17 (Whereupon, Plaintiff's  
18 Exhibit 104, Canal 0048627  
19 through 630, was marked for  
20 identification, as of this  
21 date.)

22 Q. This is a text conversation  
23 between you and Mr. De Niro.  
24 Looking at page two of the document,  
25 at 9:15 p.m., you wrote, "Chase

1 T. CHEN  
2 e-mailed. She is threatening legal  
3 action if she still doesn't get a  
4 response by the 12th. Tom is  
5 getting ready to hit her hard with  
6 his letter." And then if we turn to  
7 the next page, Mr. De Niro writes,  
8 at 9:44 p.m., "Can you believe  
9 Chase? As I said to Tom, who the  
10 fuck does she think she is?" And  
11 you wrote, "She thought she was your  
12 wife. I saw it from the beginning.  
13 I told you." Mr. De Niro responds,  
14 "The balls. The nerve. The  
15 chutzpah. The sense of entitlement.  
16 How dare her." And you write, "Tom  
17 will get her."

18 How did Mr. De Niro react  
19 when Ms. Robinson threatened legal  
20 action?

21 MS. LAZZARO: Objection  
22 to the form.

23 MR. WARD: Objection to  
24 the form.

25 THE WITNESS: Do I

1 T. CHEN

2 answer?

3 MR. WARD: Yes.

4 THE WITNESS: Okay.

5 A. I wasn't there when he  
6 first found out.

7 Q. In subsequent conversations  
8 you had with him, how did he react  
9 to Ms. Robinson's threat of legal  
10 action?

11 MS. LAZZARO: Objection  
12 to the form.

13 MR. WARD: Objection to  
14 the form.

15 MR. DROGIN: Counsel, to  
16 avoid it appearing like you  
17 are deliberately misleading  
18 the witness, can you just  
19 confirm that the texts that  
20 you are referring to are from  
21 July 2nd, 2019, and this was  
22 prior to the time that Mr.  
23 Pagano ever contacted me?  
24 You should just (inaudible)  
25 that this is not the legal

1 T. CHEN

2 action that was threatened by  
3 the attorney.

4 MS. MACMULLIN: This is a  
5 text message, from July 2nd,  
6 2019, which speaks for  
7 itself.

8 MR. DROGIN: Yes. I am  
9 just asking you not to imply  
10 that this occurred after Mr.  
11 Pagano appeared on the scene.  
12 It is misleading.

13 MS. MACMULLIN: I simply  
14 read aloud the text messages  
15 which say that Ms. Robinson  
16 was threatening legal action.

17 MR. DROGIN: You didn't  
18 read aloud the text messages.  
19 You read aloud the text.  
20 Part of the text messages is  
21 the date and time. You  
22 omitted that, which is fine.  
23 Except it is misleading to do  
24 so in this circumstance that  
25 you are talking about a

1 T. CHEN

2 threat of legal action.

3 MS. MACMULLIN: Madam  
4 Court Reporter, can you  
5 please read back my question?

6 (Whereupon, the requested  
7 portion was read back by the  
8 reporter:

9 Q: In subsequent  
10 conversations you had with  
11 him, how did he react to Ms.  
12 Robinson's threat of legal  
13 action?)

14 MR. DROGIN: Other than  
15 what is written there, right?

16 MS. MACMULLIN: Yes.

17 THE WITNESS: Do I  
18 answer?

19 MR. WARD: Yes. You can  
20 answer.

21 A. Can you ask the question  
22 again?

23 Q. Sure. I will rephrase the  
24 question.

25 Describe for me any

1 T. CHEN

2 discussions you had with Mr. De Niro  
3 concerning Ms. Robinson's threat of  
4 legal action?

5 A. Like her -- she is a clown.

6 MR. DROGIN: Are you  
7 confining that to a time  
8 period, or are you opening it  
9 up?

10 MS. MACMULLIN: I am  
11 speaking about discussions at  
12 any time.

13 Q. And sorry, Ms. Chen, you  
14 can continue.

15 A. He just said, you know, she  
16 is -- exactly what I said. Just let  
17 her. She is a clown.

18 MS. MACMULLIN: We can  
19 move to the next document,  
20 which is Bates stamped  
21 Robinson 00005297. Sorry.  
22 That carries onto 5299. We  
23 will mark that as Plaintiff's  
24 Exhibit 105.

25 (Whereupon, Plaintiff's

1 T. CHEN

2 Exhibit 105, Robinson  
3 00005297 through 5299, was  
4 marked for identification, as  
5 of this date.)

6 Q. Do you recognize this  
7 document?

8 A. Yes.

9 Q. And what is it?

10 A. It is a letter that Tom  
11 wrote to Chase.

12 Q. Did you provide input to  
13 Mr. Harvey concerning this letter to  
14 Ms. Robinson?

15 A. No.

16 Q. What did Mr. De Niro hope  
17 would be the effect of Mr. Harvey's  
18 letter to Ms. Robinson?

19 MS. LAZZARO: Objection  
20 to the form.

21 A. We never discussed that.  
22 He just said, "She is going to do  
23 what she is going to do. She is  
24 stupid."

25 Q. Were you pleased with Mr.

1 T. CHEN

2 Harvey's letter?

3 MR. WARD: Objection to  
4 the form.

5 A. No. It is really sad when  
6 you have to write a letter like this  
7 to a person that has been in your  
8 personal home, that you tried to  
9 invite them in. And when you know  
10 your boyfriend is a really wonderful  
11 person, who gave this person a lot  
12 of opportunities to prove herself,  
13 and instead she stole and conned  
14 him. It is very depressing when a  
15 letter like this has to be written.  
16 And this person has been around our  
17 personal friends, our personal  
18 family. It is like we violated  
19 everybody by allowing her to be  
20 around them. It is very sad to  
21 write a letter like this. It is  
22 worse to read it to know that there  
23 is as person like this that exists  
24 out there.

25 MS. MACMULLIN: We can

1 T. CHEN

2 move to the next document,  
3 which is Bates stamped Canal  
4 0048028 through 030. And  
5 this is Plaintiff's Exhibit  
6 106.

7 (Whereupon, Plaintiff's  
8 Exhibit 106, Canal 0048028  
9 through 030, was marked for  
10 identification, as of this  
11 date.)

12 MR. WARD: Can you say  
13 that again?

14 MS. MACMULLIN: Yes. It  
15 is Canal 0048028 through 030,  
16 and it is Exhibit 106.

17 Q. Ms. Chen, this is a text  
18 conversation between you and Ms.  
19 Weeks-Britain?

20 A. Uh-huh.

21 Q. And if you turn to the  
22 second page, at 12:58 p.m., you  
23 wrote, in all caps, "OMG and the  
24 letter Tom wrote?"

25 A. Uh-huh.

1 T. CHEN

2 Q. Ms. Chen, were you pleased  
3 with Mr. Harvey's letter?

4 A. I don't believe I was  
5 referencing the letter that you are  
6 referencing. Which letter are you  
7 referencing that I -- you are asking  
8 me if I was pleased about?

9 Q. What letter were you  
10 referencing in this text message?

11 A. The letter that I actually  
12 read. Not the one that you are  
13 probably talking about. Could you  
14 please specify what letter you are  
15 talking about?

16 MR. DROGIN: So the  
17 record is clear, this text is  
18 dated June 15th, 2019. Mr.  
19 Harvey's letter is July 11th,  
20 2019.

21 Q. So Ms. Chen, which -- what  
22 letter are you referencing in this  
23 text message?

24 A. It was something else that  
25 I had -- because I talked to Tom

1 T. CHEN

2 regularly about different things.

3 But I think it was a different  
4 letter, not one pertaining to Chase.

5 Q. Okay.

6 MS. MACMULLIN: We are  
7 going to move to the next  
8 document, which is Bates  
9 stamped Canal 0048976 through  
10 978. We will mark this as  
11 Plaintiff's Exhibit 107.

12 (Whereupon, Plaintiff's  
13 Exhibit 107, Canal 0048976  
14 through 978, was marked for  
15 identification, as of this  
16 date.)

17 A. This -- it is three pages?

18 Q. It is.

19 A. Okay.

20 Q. So if we turn to the second  
21 page of the document, at 8:54 p.m.,  
22 you wrote, "Tom is too feisty." I  
23 think it might be missing the word  
24 "too." "But it says, "Tom is too  
25 feisty. Let this go with a few fire

1 T. CHEN

2 works and a big big bang."

3 A. Uh-huh.

4 Q. At the time that you sent  
5 this text message, on July 26, 2019,  
6 had Mr. De Niro made a decision yet  
7 about whether he would bring  
8 litigation against Ms. Robinson?

9 A. No. He never discussed  
10 that with me.

11 Q. Do you --

12 MS. MACMULLIN: We can  
13 take a five minute restroom  
14 break right now. That would  
15 be great.

16 THE VIDEOGRAPHER: The  
17 time is now 3:53 p.m. We are  
18 off the record.

19 (Whereupon, a recess was  
20 taken at this time.)

21 THE VIDEOGRAPHER: The  
22 time is now 4:02 p.m. We are  
23 back on the record.

24 Q. Ms. Chen, were you involved  
25 in any discussions about the timing

1 T. CHEN

2 of filing a lawsuit against Ms.  
3 Robinson?

4 A. Not at all. I found out  
5 about it on my news feed on the  
6 phone.

7 Q. Do you have any knowledge  
8 of how the decision was made to seek  
9 millions of dollars in the  
10 litigation against Ms. Robinson?

11 A. What?

12 Q. Do you have any knowledge  
13 of how the decision was made to seek  
14 millions of dollars in the  
15 litigation against Ms. Robinson?

16 MR. WARD: Objection to  
17 the form. You can answer.

18 A. No. I don't know anything  
19 about what the lawyers discussed to  
20 do.

21 Q. So prior to the lawsuit  
22 being filed, you had no idea that  
23 Canal was going to file a lawsuit  
24 against Ms. Robinson?

25 A. No.

1 T. CHEN

2 Q. Meaning, correct?

3 A. Huh?

4 Q. Just your answer no?

5 A. No.

6 Q. I'm sorry. No, that is  
7 fine.

8 Correct, you had no idea  
9 that Canal was going to file a  
10 lawsuit against Ms. Robinson prior  
11 to that?

12 A. You are correct. I did not  
13 have any knowledge of that prior.

14 Q. Thank you.

15 Your boyfriend never  
16 discussed with you that he was going  
17 to bring a multi-million dollar  
18 lawsuit against his former employee?

19 A. (No verbal response).

20 Q. If you could just answer  
21 verbally.

22 A. I'm sorry. No.

23 Q. That is okay.

24 And again, that is no,  
25 meaning, correct?

1 T. CHEN

2 A. He did not. I had no  
3 knowledge.

4 Q. How did Mr. De Niro react  
5 to the media coverage of the -- of  
6 his lawsuit against Ms. Robinson?

7 MS. LAZZARO: Objection  
8 to the form.

9 A. I don't -- what do you mean  
10 by how? I don't -- I don't get what  
11 you mean by it. He obviously knew  
12 -- I didn't -- he knew before I knew  
13 it was going on. So he had  
14 knowledge of it.

15 Q. Did you have any discussion  
16 with Mr. De Niro about the media  
17 coverage of Canal's lawsuit against  
18 Ms. Robinson?

19 A. No. We all -- we only --  
20 when it was on -- the SNL stuff,  
21 that was the only time it came up  
22 and because it was -- it was  
23 ridiculous. I mean, this is what  
24 Chase was doing. You could never  
25 find her for anything and she is

1 T. CHEN

2 watching Netflix so that was the  
3 only time -- like when the SNL skit  
4 came up, that was the time we just  
5 kind of went well, like thank God  
6 she is gone kind of thing, and that  
7 was it. And then, you know, Bob  
8 feels bad for her. We all feel bad  
9 for her. But, you know, it is what  
10 it is. She did what she did, and  
11 that is it, and that was the only  
12 discussion -- I wouldn't even call a  
13 discussion. It was a comment while  
14 watching SNL.

15 Q. Did you have any  
16 discussions with Mr. De Niro about  
17 him speaking with the District  
18 Attorney's Office concerning Ms.  
19 Robinson?

20 A. No.

21 Q. How did Mr. De Niro react  
22 to the District Attorney's Office  
23 decision not to prosecute Ms.  
24 Robinson?

25 A. I don't know. I didn't

1 T. CHEN

2 even know about that.

3 Q. On how many occasions did  
4 you, personally, witness Ms.  
5 Robinson yell at Mr. De Niro?

6 MR. WARD: Objection.

7 You can answer.

8 A. In my house, in front me,  
9 in the morning, when he is asking  
10 for his schedule, she would turn to  
11 me and roll her eyes, and say, "Oh,  
12 my God. He is just so annoying. I  
13 can't stand him anymore." And I  
14 wanted -- I really wanted to tell  
15 her off then, but I understood there  
16 was a professional relationship with  
17 her and Bob, and I just wanted to  
18 get involved. I just ignored her.  
19 I have seen her yell at Bob in the  
20 house -- another time when it was  
21 like I think the plants were coming  
22 in. I have heard her scream at him  
23 over the phone. She is always  
24 instigating something. It was like  
25 there would be no reason to be as

1 T. CHEN

2 crazy as she would be, but like she  
3 always wanted attention and to cause  
4 a circus around her, and then she  
5 would cry and complain about it  
6 later. And everybody is just like  
7 just leave us alone. You are crazy.  
8 She yelled at him, and she yelled at  
9 everybody else in the house so I  
10 can't even count the number of times  
11 it was just him. It was like every  
12 time she was there she was very  
13 nasty to everyone.

14 Q. And how many times did you,  
15 personally, observe Ms. Robinson  
16 yell at Mr. De Niro?

17 A. On the phone or in person?

18 Q. Either?

19 A. It was a few times. I  
20 can't keep track of it because all  
21 she did -- she was so nasty all the  
22 time. All she did was yell at  
23 people. So you can't keep track of  
24 it. You just know she does it to  
25 everybody, and then you sort of

1 T. CHEN

2 dismiss it because she does it to  
3 everybody in a way. And then if she  
4 doesn't yell one day, you are like,  
5 oh, well, Chase behaved.

6 Q. How many times did you,  
7 personally, observe Ms. Robinson  
8 yell at another Canal employee?

9 A. Like I said before, it is  
10 impossible to give you a number  
11 because she just yelled all the time  
12 at everyone randomly. It is -- it  
13 is her way of asserting herself I  
14 guess or trying to get attention.  
15 It was a regular form of  
16 communication for her. Not a nice  
17 person. Very bitter.

18 Q. Could you please  
19 approximate how many times you  
20 personally observed Ms. Robinson  
21 yelling at another Canal employee?

22 A. Every single time she was  
23 in my presence she yelled at someone  
24 and it was appalling.

25 Q. How many times were you in

1 T. CHEN

2 Ms. Robinson's presence?

3 MR. WARD: Objection.

4 A. I was never in her  
5 presence. She was imposing her  
6 presence on me in my home  
7 constantly.

8 Q. How many times were you  
9 physically in the same space as Ms.  
10 Robinson?

11 A. More than I care to  
12 remember. I couldn't give you a  
13 fair numerical number, but it was --  
14 it was too much.

15 Q. Could you please  
16 approximate?

17 MR. WARD: Objection.

18 A. No, I cannot. I have  
19 already said that I could not. It  
20 would be inaccurate if I did. But  
21 every time I saw her she was very  
22 rude and nasty. There was never a  
23 time that she was polite. Never.

24 Q. Since Ms. Robinson's  
25 employment ended, has Mr. De Niro

1 T. CHEN

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**Abstract**

**[REDACTED]**

**Abstract**

**[REDACTED]**

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1 T. CHEN

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1 T. CHEN

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5 MS. MACMULLIN: We are

6 going to move to a document

7 that is Bates stamped Canal

8 0048810 through 812. We will

9 mark this as Plaintiff's

10 Exhibit I believe we are on

11 108. Thanks, everyone.

12 (Whereupon, Plaintiff's

13 Exhibit 108, Canal 0048810

14 through 812, was marked for

15 identification, as of this

16 date.)

17 Q. This is a text conversation

18 between you and Mr. De Niro.

19 A. Uh-huh.

20 Q. If you turn to the second

21 page, at 6:35 p.m., you wrote,

22 "Tom's recap on Chase was

23 hilarious."

24 A. Yes.

25 Q. What, specifically, did Mr.

1 T. CHEN

2 Harvey say about Ms. Robinson?

3 A. I don't remember.

4 Q. Do you have any  
5 recollection of what you were  
6 referring to in this text message?

7 A. No, I don't.

8 MS. MACMULLIN: We can  
9 move to a document that is  
10 Bates stamped Canal 0048031  
11 through 033, and I will mark  
12 that as Plaintiff's Exhibit  
13 109.

14 (Whereupon, Plaintiff's  
15 Exhibit 109, Canal 0048031  
16 through 033, was marked for  
17 identification, as of this  
18 date.)

19 Q. Ms. Chen, this is  
20 conversation between you, Jillian  
21 Spear, and Sabrina Weeks-Britain.  
22 If you turn to the second page of  
23 the document?

24 A. Uh-huh.

25 Q. At 1:12 p.m., you wrote,

1 T. CHEN

2 "And Tom put me down as a witness  
3 against Chase." And then later down  
4 on the page, at 1:14 p.m., you  
5 wrote, "I can't wait."

6 A. Uh-huh.

7 Q. You were excited to be  
8 identified as a witness against Ms.  
9 Robinson, is that correct?

10 A. Yes.

11 Q. Why were you excited to be  
12 identified as --

13 A. Because she is such a liar,  
14 and such a horrible person, and  
15 treated me so poorly, and so many  
16 other people so poorly, and abused  
17 her boss in front of a whole  
18 household, my household. And it  
19 felt so great to be able to say what  
20 this person has done and put it in  
21 her face, so she knows that we all  
22 are aware of her crappy behavior,  
23 and hopefully, maybe, she would see  
24 the damage she has done and be aware  
25 of her ways and change. It was like

1 T. CHEN  
2 the greatest thing to have a voice  
3 in this matter.

4 MS. MACMULLIN: We are  
5 going to take a brief break.  
6 Counsel, I anticipate  
7 concluding my questioning  
8 shortly after the break.  
9 Does anyone anticipate any  
10 redirect?

11 MR. DROGIN: I don't  
12 know. We will let you know  
13 after you are done.

14 MS. MACMULLIN: Okay. So  
15 we can come back in five  
16 minutes.

17 THE VIDEOGRAPHER: The  
18 time is now 4:16 p.m. We are  
19 off the record.

20 (Whereupon, a recess was  
21 taken at this time.)

22 THE VIDEOGRAPHER: The  
23 time is now 4:28 p.m. We are  
24 back on the record.

25 Q. Ms. Chen, given how abusive

1 T. CHEN

2 and dishonest you described Ms.  
3 Robinson to be, why did Mr. De Niro  
4 continue to employ her for 11 years?

5 MS. LAZZARO: Objection  
6 to the form.

7 MR. WARD: Objection.  
8 You can answer.

9 A. From what I understand, she  
10 is so two faced about a lot that she  
11 -- she is so -- she is like crazy.  
12 Part of the reason is that like  
13 everybody felt she was crazy, and  
14 people didn't always tell Bob about  
15 the abuse she had administered to  
16 them because he is so busy. The  
17 last thing they want to do is bother  
18 him with something that seems sort  
19 of petty even though it was a  
20 serious problem. I do know that --  
21 I learned from Michael Kaplan there  
22 were a couple of times that Chase  
23 was going to be fired for being  
24 lazy, a pain in the ass, and mean,  
25 and nasty. And I think that, you

1 T. CHEN

2 know, they felt bad to fire her.

3 And they wanted to try -- and then

4 Bob would just get so busy that they

5 wouldn't really address the issue so

6 much, it would kind of go, and then

7 it would come to a head. And I

8 think there were a couple of times

9 that she was about to be terminated,

10 but they felt sorry for her for some

11 reason.

12 Q. Why did Mr. De Niro feel

13 sorry for Ms. Robinson?

14 MR. WARD: Objection.

15 MS. LAZZARO: Objection

16 to the form.

17 THE WITNESS: Do I still

18 answer?

19 MR. WARD: Yes.

20 A. Because she is unstable.

21 MR. DROGIN: (Inaudible).

22 THE WITNESS: What?

23 Q. You can continue, Ms. Chen.

24 A. Okay. I'm sorry. Could

25 you ask me the question again?

1 T. CHEN

2 Q. Sure.

3 Why did Mr. De Niro feel  
4 sorry for Ms. Robinson?

5 MR. WARD: Objection.

6 A. Because she is sort -- I am  
7 trying to find more delicate words  
8 to say this. She is a mess, and she  
9 is pathetic, and crazy. I don't  
10 know what else to say. It is like  
11 when you can't figure a person out,  
12 but they seem to get some of the job  
13 done for you, and you are so busy  
14 running around. And you think they  
15 are doing the work, but they are  
16 not. They are actually taking  
17 credit for other people's work  
18 because you are so busy running  
19 around. Like I guess that is why he  
20 felt sorry for her. He didn't  
21 really know the truth of what was  
22 actually going on, and how bad she  
23 was, and how much she was stealing,  
24 and how much she was lying. She  
25 somehow painted another picture for

1 T. CHEN

2 him. He did say that she -- you  
3 know -- her manner with him was  
4 inappropriate at times. And he  
5 didn't like when she would misstep.  
6 But he is just like -- he is just a  
7 nice guy. He never would want to  
8 fire anyone. He doesn't want to  
9 hurt people's lives. That is why he  
10 let's them stay on, like this one.  
11 And this is what happens when you  
12 let people like this stick around.  
13 They make trouble.

14 MS. MACMULLIN: That  
15 concludes my questioning for  
16 today. Counsel, is there any  
17 redirect?

18 MR. WARD: None from me.  
19 Thank you.

20 MR. DROGIN: None from  
21 Canal.

22 MR. ROKUSON: Nope.

23 Q. So Ms. Chen, that concludes  
24 your deposition. Thank you for  
25 appearing today and persevering

1 T. CHEN  
2 through the technological  
3 difficulties, and I hope you have a  
4 great evening.

5 A. You, too. Thank you, Kate.

6 THE VIDEOGRAPHER: The  
7 time is 4:34 p.m. and we are  
8 off the record.

9 (Time Noted: 4:34 p.m.)

10

11 TIFFANY CHEN

12

13 Subscribed and sworn to  
14 before me this day of  
15 2022.

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18 Notary Public

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## I N D E X

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WITNESS	EXAMINATION BY	PAGE
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Tiffany Chen	Ms. MacMullin	5
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## EXHIBITS

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75	Canal 0046210	73
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79	Canal 0048687 to 8690	96
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C E R T I F I C A T E

I, PAIGE HAYDEN, hereby certify that the Examination Before Trial of TIFFANY CHEN was held before me on the 30th day of March, 2022; that said witness was duly sworn before the commencement of her testimony; that the testimony was taken stenographically by myself and then transcribed by myself; that the party was represented by counsel as appears herein;

That the within transcript is a true record of the Examination Before Trial of said witness;

That I am not connected by blood or marriage to any of the parties; that I am not interested directly or indirectly in the outcome of this matter; that I am not in the employ of any of the counsel.

IN WITNESS WHEREOF, I have hereunto set my hand this 30th day of March, 2022.

*Paige Hayden*  
PAIGE HAYDEN

	ERRATA SHEET			
	PAGE	LINE (S)	CHANGE	REASON
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16				
17	TIFFANY CHEN			
18	SUBSCRIBED AND SWORN TO BEFORE ME			
19	THIS _____ DAY OF _____, 20__.			
20	_____			
21	(NOTARY PUBLIC)		MY COMMISSION EXPIRES:	
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